

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
1	12/14/2021	David	Villarino	Question	LRP Timeline	Is there a schedule for intermediate steps in the development of the plan?	James: We have a schedule we will share with the committee later in the meeting.	Committee Meeting - Spoken Comment
2	12/14/2021	Victor	Lopez	Question	LRP Timeline	When we say 'Long Range Plan' - are we looking to 50 years, 100 years?	James: We think of time as an environmental condition, not time. Our timeline is based on future recession if nothing had been done.	Committee Meeting - Spoken Comment
3	12/14/2021	Eric	Reyes	Question	LRP Timeline	How will we ensure plan is complete in 2022, given time taken for outreach?	SSMP will do what it takes to stay on schedule while also developing an actionable plan. One of the flexibilities we have is resources and we're looking to add resources to our team to help the workload we are undertaking.	Committee Meeting - Spoken Comment
4	12/14/2021	Luis	Olmedo	Question	LRP Process	How does the community get in earlier? There needs to be integration from beginning. Need community's knowledge and experience, the local experience. Citizen science is now a well-accepted institutional framework. I don't see it in evaluation of criteria and amount of habitat created, as well as methodologies and evaluations. I recommend we find a way to amplify engagement from the beginning instead of as a standalone step.	Science committee will have public engagement and community outreach process that will be built in to the way that the committee is developed. We will be reconvened at the end of January and it will have a public component to it.	Committee Meeting - Spoken Comment
5	12/14/2021	Pat	Cooper	Comment	LRP Process	We are at the mercy of the state in regards to how much money we have. Our first big win of money was in the last bond. If we don't have a bond we run out of money for planned projects. I'm hoping that there's the financial plan as well as how we are going to have the administration put us in future bonds. Need to have that in the back of our minds.	Bill: (Late) John Benoit considered it an important step in the Sea. James: We will record your comment of funding as a key constraint consideration.	Committee Meeting - Spoken Comment
6	12/14/2021	Art	Gertz	Comment	LRP Process	State has fallen short in achieving milestones within 10 year plan. Without importation, there is enough water available to restore most of West Shores, mitigate dust, create habitat in the form of free hard water wells owned by CVWD. The wells were given by Salton Sea Community District. These wells have been providing water for west shore until replaced by soft water. They produce 1 af/water per 101 minute. These wells have been idled since May and can be used for projects, but it has to be made affordable. We also have a potential distribution system already in the area.	James: We are soon embarking on the step of identifying any new potential action and strategy. You laid out a potential action and strategy. Please put together a concept in writing to get us a head start in terms of our ability to evaluate the concept.	Committee Meeting - Spoken Comment
7	12/14/2021	David	Villarino	Comment	LRP Process	Need to make sure we put something together with financial planning with future funding in mind, so that when we have a plan, we don't have a plan with no funding to implement.	We will incorporate funding requirements for the initial construction, and additionally for operations and maintenance.	Committee Meeting - Spoken Comment

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8	12/14/2021	Chuck	Parker	Comment	LRP Process	I'm concerned that some of the ways this is initially being structured might limit what conclusions we reach. For example, it's been brought up a couple of times that you want community involvement, and yet there is no representation on this committee at this time for the nine cities of the Coachella Valley and they have a very large stake of what happens at the Salton Sea. For example, recreation. People want Salton Sea restored to what it used to be. All the comments are pushing in the direction of we can't have that, let's go for something more limited. I already sent an email to James and Arturo about objecting to the choice of employing a staff of CVAG as opposed to elected members. This concept of incremental funding is putting the cart before the horse. Our goal is to come up with the plan to find the goal, and then find the money. We need to focus on determining what we want here. In the 2016 report funded by the Salton Sea Authority, they talked about building a perimeter lake and projected 50 to 70 years and that's totally unacceptable in my view and I think for a lot of people. The last thing is, I hope that this committee takes into consideration the drought. People 5 years ago may have thought there was enough water, but we're in a drought and there's no estimation of when that's going to change. That will really affect the viability of the concepts. There's going to be less water, period.	Bill: Perimeter lake was 15 year concept. But it all depends on whether state funding is available. The state came up with the preferred alternative and funding was never available for it. Incremental funding could be a factor in terms of achieving things. We should consider the value and risk of implementing projects in small pieces, against the value and risk of waiting for funding for a larger project. James: We will have an objective analysis in regards to risk of available funding moving forward such that we are not precluding the projects that deliver the best value.	Committee Meeting - Spoken Comment
9	12/14/2021	David	Villarino	Question	LRP Process	How do we sustain implementation of this plan? That is the key point relative to financing and engagement and all the other aspects.	Concern noted.	Committee Meeting - Spoken Comment
10	12/14/2021	Luis	Olmedo	Comment	LRP Process	When we talk about community engagement, it seems like that is measured by number of people in the room and that is so far from the reality we face in a disadvantaged community. That overlooks the real barriers the community faces. As you go through the process, it's important to take a few steps back and make sure the community has the opportunity to access everything they need, like access to technology and affordability. Be inclusive History of the people of here--90% of people of color--their history and needs are not addressed, we need to look at this to build metrics that are more suitable to the community.	We hope to address community engagement through a series of workshops and other target outreach to frontline communities.	Committee Meeting - Spoken Comment
11	12/14/2021	David	Villarino	Comment	Community Engagement	Basic step if we want to expand access: Do personal visits, talk to individual residents, share one-pager. Then invite them to committee meeting at community center, school, or some place that is accessible with presentation that gives a general overview of what we are doing. Then we can communicate and get what is in their best interest. Get reps to articulate their ideas.	The SSMP Team is committed to meaningful community engagement and implement best strategies to engage residents throughout the implementation of the SSMP. The SSMP Team has strong partnerships with regional CBOs and local entities to help deliver information and seek the resident's involvement and acquire their feedback and suggestions.	Committee Meeting - Spoken Comment
12	12/14/2021	Victor	Lopez	Question	Community Engagement	We need to define the communities - so what communities will be included. How far inland from the Salton Sea are we going?	We hope to address community engagement through a series of workshops and other target outreach to frontline communities.	Committee Meeting - Spoken Comment

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
13	12/14/2021	Chuck	Parker	Comment	Community Engagement	Restating including the cities in Coachella Valley cities and people who live in Coachella Valley in outreach. There is no divergence in expectation from people who live in the richer communities versus those who live in the poorer communities. Both suffer from the same problems. Need community meetings in both places.	The Coachella Valley Association of Governments (CVAG) was invited to join the Long-Range Planning Committee and provide input on behalf of the cities throughout the Coachella Valley. The SSMP team and Engagement Committee will also consider additional outreach efforts to engage the communities of the Coachella Valley.	Committee Meeting - Spoken Comment
14	12/14/2021	Luis	Olmedo	Comment	Community Engagement	It is difficult to engage community because they feel their history and contributions are not being considered. They do not feel ownership, and given this history, they will never feel like they are actual stakeholders. There's a lot of dismantling we need to do. The other thing I was going to say is that there's a lot of nonprofits out there working with people and they're not engaged. We need to invite these other organizations to be part of this process so they are engaged, they are boots on the ground and community leaders, they are organized.	The Engagement Committee advises and assist the State in engaging local community; to inform, engage, and solicit input for the State to integrate to the Phase 1: 10-year Plan and long-range planning for the Salton Sea. The members of the Engagement Committee represent Tribal governments, local communities, and key stakeholder groups, as well as for their expertise in reaching and meaningfully engaging those that would otherwise be difficult for the State to reach. The Committee members are looking into identifying potential gaps for representation and include them into the conversations.	Committee Meeting - Spoken Comment
15	12/14/2021	Feliz	Nunez	Comment	Community Amenities	Health of the community needs to be addressed, respiratory problems in the community are being incurred by dust as a pollutant. Dust has to be covered right now, it is very urgent as far as dust is concerned. I wish people making decisions would understand this needs to be done immediately. If it takes water importation, it needs to be done. Whoever was responsible should be here to clean it up. Put wastewater plants to treat raw sewage going to New and Alamo Rivers.	Protecting or improving air quality is an objective in the plan. Restoration actions will be measured by how much emissive playa would remain following implementation.	Committee Meeting - Spoken Comment
16	12/14/2021	Rob	Simpson	Comment	Other	Questions on science regarding importing or not importing water. If you do import water, you would need about 500,000 Af per year may be needed. I would like more accurate data as to where and how that would occur. If you reduce surface area of the Salton Sea, you will lower elevation 18 feet below current level. This will reduce groundwater mounding below the surface of the Salton Sea, meaning aquifer in places like the Coachella Valley will tend to flow by gravity downhill to the new horizon of where that groundwater percolates down. Is there any science that has looked at that? Secondly, evapotranspiration will impact weather and/or precipitation within the Colorado River basin. It will impact it, the question is by how much? Conserving and transporting water out of basin not a good idea - it means you get less water out of Colorado River. If you do import, will probably come out of Sea of Cortez, the other source of water, is a rapidly changing area threatened by sea level rise and subsidence of the road plain. There's three areas of science there that I have not heard any knowledge or expression thereof.	Comment noted. An independent review of proposals that include water importation is currently underway. This review will be incorporated into the Long-Range Plan.	Committee Meeting - Spoken Comment
17	12/14/2021	Pat	Holland	Comment	Other	I live in San Diego and I get asthma from the Santa Anas. There is precedence to get the manufacturers of the pollutants to pay for the cleanup. The EPA forced that in the East Coast. Please consider it, the problem who created the problem ought to pay for it and the pollutants ought to be banned and recalled.	Protecting or improving air quality is an objective in the plan. Restoration actions will be measured by how much emissive playa would remain following implementation.	Committee Meeting - Spoken Comment

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18	12/14/2021	Nathan	White	Comment	LRP Process	Maybe there's a public facing publishing of the meetings so that interested community members can access that information on their leisure time and can always email with comments. It sounded like from description there is a lot of review from long range planning of prior projects that have been reviewed many times. What's the process for new project submittals? Is there a formal process for submitting proposals that fit in with that? What's the timeline, what's the criteria, what are the documents needed? The study of non-import situations is critical to understand how that impacts the region. That, from the environmental assessment standpoint can happen very soon. The other question I have is from IID's information and other groups, a lot of dust comes from Ocotillos Wells. Is the Long Range Planning committee interested in that other 50% of dust impacts happening there? Is there an interest in projects that mitigate toxins coming from Alamo and New River? Is there a submittal process there?	Sarah: On the question of new projects and how that will be received, we can clarify afterwards. James: We have begun to create a process for identifying new projects. This was not stated in the presentation today. We will work to define what that process will look like before the next meeting.	Committee Meeting - Spoken Comment
19	12/14/2021	Cynthia	Wootton	Question	LRP Committee Membership	I'm a volunteer at Salton Sea State Recreation Area. Will the Audubon Society be involved since this is the Pacific flyway? Will Sonny Bono and Salton Sea Recreation Area be involved in this process? We help dispel misconceptions about this place in youtube videos and news reports. Will misconceptions be addressed in any ways?	Sarah: The Sonny Bono Refuge and State Park are involved in this process. James: Audubon is represented via the Salton Sea Partnership, the broader environmental organization. We appreciate the perspective on narratives about Salton Sea. It's difficult to form an unbiased opinion about the Salton Sea. We're currently working to provide accurate updates through our annual reporting. However, an annual basis is not the most effective way to produce messaging for every audience. SSMP looking at better ways of communicating besides the Annual Reporting such as dashboard where we can share real time information on things happening in the Salton Sea area.	Committee Meeting - Spoken Comment
20	12/14/2021	Tom	Sephton	Comment	LRP Process	What should the term of this long-term plan be? Should be looking at a long term multi-generational horizon at a minimum, there needs to be a plan in place and operational within the time frame that the Sea is declining to -250 feet below sea level. Have lost nine feet and will lose a lot more, will be extremely saline. Science Committee findings at a minimum should be shared with Engagement Committee and there should be a review and comment back to the Science committee from the Engagement Committee. The Long Range Plan should not assume funding will come in small chunks: we need a plan for protecting public health, restoring and sustaining the environment, and supporting the community around the sea.	Comment noted. The science committee will review criteria we use to determine how we measure "effectiveness" of individual restoration actions.	Committee Meeting - Spoken Comment
21	12/14/2021	Ed	Luna	Comment	Community Engagement	Not having seen the mission statement yet, I'd like to be comforted in knowing that your mission statement will also include the locals and Tribal sovereignty concerns as important to the studies and not simply as collateral damage to the goals you hope to achieve.	This process will include direct consultation with Tribal Governments.	Committee Meeting - Spoken Comment
24	12/14/2021	Laura	Harnish	Question	LRP Committee Membership	Is there a list somewhere of the members of the committee?	Yes, the list of member on the Long-Range Planning Committee will be posted to the Salton Sea Management Program website: https://saltonsea.ca.gov	Committee Meeting - Zoom Chat

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26	12/14/2021	Ed	Luna	Comment	LRP Goals & Objectives	We do need to include other approaches to the SSMP other than insights based solely on political and economic (recreational revenue anticipating) gains.	Concepts will be evaluated according to several measures across the categories of "effectiveness, acceptability, efficiency, and completeness."	Committee Meeting - Zoom Chat
27	12/14/2021	Marty	Schoenberg	Question	Community Engagement	Will a recording of this meeting be made available later	We will post presentations and a succinct log of comments, responses, and decisions from the Long-Range Plan Committee meetings to https://saltonsea.ca.gov .	Committee Meeting - Zoom Chat
28	12/14/2021	Pat	Holland	Question	Other	Have you looked at nano metals, nano plastics, nano toxins that can enter any organ including the brain?	This is beyond the scope of our evaluation.	Committee Meeting - Zoom Chat
29	12/14/2021	Pat	Holland	Question	LRP Goals & Objectives	Can/will you get EPA to make the makers of pollutants responsible for paying for the clean-up of the pollutants? Can you get some of the ingoing pollutants banned? Will you? will you get an immediate recall with the above ban on manufacture ,sales, use, gifting, importation, exportation.	These topics are beyond the scope of our plan.	Committee Meeting - Zoom Chat
30	12/14/2021	Cynthia	Wootton	Comment	Other	I'd like more info perimeter lake concept especially about the dikes being considered.	This concept will be available for review at https://saltonsea.ca.gov	Committee Meeting - Zoom Chat
31	12/14/2021	Dan	Villarino	Comment	Other	FIELD has access to a mobile waste water treatment technology that could be utilized for west shores hard water that is very cost effective which has been utilized and approved by US DO Defense	Please submit this concept for review on our concept template form between March 2, and April 2, 2022.	Committee Meeting - Zoom Chat
32	12/14/2021	Ed	Luna	Question	Other	It may be helpful to cite specific agencies, groups or individuals who really support a local-assessment funded rec lake; can we assume only North Lake Project supporters?	Our evaluation likely would refrain from this assumption, however your comment is noted for consideration.	Committee Meeting - Zoom Chat
34	12/14/2021	Pat	Holland	Comment	Other	There is precedence for US EPA forcing toxic water cleanup costs on manufacturer of pollutants. (East coast pollution leaking into ocean and killing sea creatures, the polluter was the International Flavor and Fragrance Industry) I found this info on line. Pat Holland	This topic is beyond the scope of our evaluation.	Committee Meeting - Zoom Chat
35	12/14/2021	Pat	Holland	Comment	Other	When Santa Anna's blow in the Salton Sea's pollution, San Diegans get sick; I am just one of them. Newscasters note that they are sickened. I am forced inside with my multistage hepafilter to protect my lungs.	Protecting or improving air quality is an objective in the plan. Restoration actions will be measured by how much emissive playa would remain following implementation.	Committee Meeting - Zoom Chat
36	12/14/2021	WQ73720		Comment	Other	Leave the technical work to the CPAs, the engineers & scientists, and other professionals. The community's role is to decide which recommended courses of action they want, that are in EVERYONES best interest.	Comment noted.	Committee Meeting - Zoom Chat
37	12/14/2021	Pati	Leal-Gutierrez	Comment	Community Engagement	One thought: create a one pager / infographic describing who LRP is, committee members, goals, objectives, outcomes, and how to engage - for the public to have. Thank you.	We will work towards this brief synopsis for the CNRA website.	Committee Meeting - Zoom Chat
38	12/14/2021	Art	Gertz	Comment	Other	Restoration in West Shores, for public health and sustainment of flora and fauna should be a top priority .This cannot happen without sustainable/affordable water supply.	Comment noted.	Committee Meeting - Zoom Chat
39	12/14/2021	Pat	Holland	Question	Other	How many people live in Coachella Valley?	This question is beyond the purpose of the LRP Committee.	Committee Meeting - Zoom Chat
40	12/14/2021	Nathan	White	Question	LRP Timeline	Seems from Bills description that long range planning charge will be evaluating many old projects that have been reviewed several times. What is the process for new projects?	Previous concepts will be updated to incorporate new knowledge. Additional concepts can be submitted through a template made available at the following URL between March 2, and April 2, 2022: https://saltonsea.ca.gov	Committee Meeting - Zoom Chat

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41	12/14/2021	WQ73720		Comment	Mtg Ground Rules	There's a fine line between community involvement and community interference. Lots of people come to meetings to vent frustrations or hear themselves talk, and some interest groups try to make this a race issue; both of these hurt the process.	Community engagement is critical for developing a successful plan.	Committee Meeting - Zoom Chat
42	12/14/2021	Ed	Luna	Comment	LRP Goals & Objectives	As a regular visitor to The Sea, I still meet many (and I stress MANY visitors from throughout our country as much as occasional foreign visitors demonstrating a healthy interest in its history and proposed visions. So. My take on this is that when discussing The Sea, the dialogue should consider that we are most definitely under a larger viewing lens than just the surrounding communities or the Valley in general.	Comment noted.	Committee Meeting - Zoom Chat
43	12/14/2021	David	Villarino	Comment	Community Engagement	concur with inviting CBO and elected officials in Riverside, IV as well as unaffiliated group	Comment noted.	Committee Meeting - Zoom Chat
44	12/14/2021	WQ73720		Comment	Other	Many of the polluters have already come and gone- there's no one to go after in many cases	Comment noted.	Committee Meeting - Zoom Chat
45	12/14/2021	Cynthia	Wootton	Comment	Community Engagement	Someone requested presentations to schools in the area. This would require lots of state staff. Maybe another approach would be to invite teachers and to attend trainings.	Comment noted. This topic aligns with the community amenities outreach that will occur.	Committee Meeting - Zoom Chat
46	12/14/2021	WQ73720		Comment	Community Engagement	Why can't CNRA just start a new webpage called "SaltonSeaHub.org" that gets updated REGULARLY with all meeting information, meeting transcripts, etc. People need a goto website for information that's not being timely disseminated.	Comment noted. We are working towards a more "real-time" webpage for Salton Sea.	Committee Meeting - Zoom Chat
48	12/14/2021	WQ73720		Comment	LRP Committee Membership	Anyone notice that the meeting is being attended by moderators, and not by key figures involved in the restoration? Nor by decision makers? This is exactly like the kickoff meeting we had last time, and look what came of it? Nothing-	Comment noted.	Committee Meeting - Zoom Chat
49	12/21/2021	Mike	Cohen	Question	LRP Timeline	Note to clarify on environmental condition versus time	If we do nothing, there's going to be a suite of environmental and health consequences that occur from the long term recession of the Salton Sea. The goal of the plan is to prevent or reduce any health or environmental consequences that would occur if nothing were done.	Committee Meeting - Spoken Comment
50	12/21/2021	Mike	Cohen	Comment	LRP Timeline	Presumably State Board will want temporal scope, they'll ask how long this will ask. If you give them a number that may be good.	The temporal scope will be informed by how long a concept would take to implement. There will likely be a range of timing needed depending on the concept.	Committee Meeting - Spoken Comment
51	12/21/2021	Luis	Olmedo	Comment	LRP Process	Science, criteria and design operate in separate spaces, and daylight for community to have a say on this. There are many models out there that better integrate community earlier in the process to co-design and co-create. Traditionally, more status quo approach has been to keep separate and it seems to me that this approach is very traditional. Recommend to make community part of the process early on. We can integrate citizen and community science, there are a lot of experts in the community that don't have a PhD.	Tonya Marshall who will be leading the science committee offered a cursory response that there will be public involvement in the science committee.	Committee Meeting - Spoken Comment
52	12/21/2021	David	Villarino	Comment	LRP Goals & Objectives	While we're helping the State develop the Long Range Plan, are there any actions or any place that the state sees that can be initiated concurrently in terms of improvements around the Salton Sea while the planning is going forward?	SSMP Team also obligated to the Phase 1 restoration action, 10-year plan. This will be going on concurrently, and yet to be determined if this plan would potentially usurp that effort at some point or if it will build on that effort.	Committee Meeting - Spoken Comment

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54	12/21/2021	Kerry	Morrison	Comment	LRP Goals & Objectives	All of the cities north of the Salton Sea passed resolutions authorizing water imports, so we wouldn't have to react by anticipating long term recession of the Salton Sea. This is set in the toning of "reducing" in objectives, which is a low bar. We could look at instead of if we do nothing, when we do something. One thing we should keep in thoughts is southwestern water sustainability in general. Let us think about a bigger plan first and then think of ways to pay for it. Thinking about the next 100 years, and think of Salton Sea in the context of water for drinking and food, it's about the entire water system. If we keep that in mind, this committee will be much more useful to the region.	Comment noted.	Committee Meeting - Spoken Comment
55	12/21/2021	Mariela	Loera	Question	Community Amenities	Really glad to see that comm amenities is reflected as a priority for this group. Besides this overlap, have there been discussion on how the community thoughts will be included, besides just public comment?	The goal is to prepare a Community Amenities Plan in coordination with the other committees and plans that are ongoing.	Committee Meeting - Spoken Comment
56	12/21/2021	Mike	Cohen	Comment	LRP Process	Use 1998/1999 SSA Reclamation Feasibility as well	We will incorporate this plan into our source material.	Committee Meeting - Spoken Comment
57	12/21/2021	Mike	Cohen	Question	LRP Timeline	Timeline presented - do we need to review and update? It looks like we are about six months back on this timeline.	That is when we started about pulling the team, started talking about the criteria that James mentioned, so it is fairly accurate. It's a significant effort to get a document out by end of next year, so we are trying to do that.	Committee Meeting - Spoken Comment
58	12/21/2021	Luis	Olmedo	Request	LRP Goals & Objectives	It would be great to get a financial account because there have been so many ideas, plans. The point we are at right now and plan moving forward, would be good to know how much money is left and how much is authorized.	The SSMP prepares an annual report. In that report includes finances from inception. 2022 report is coming out soon and will share similar update of funds. It's separate from the Long Range Plan. The upcoming 2022 report will be put out early next year. We are planning on having a broad community workshop to go over the document itself and all the sections of the report. The past years in the report, one of the final sections is the funding component. Hoping to have this event before the SWRB meeting	Committee Meeting - Spoken Comment
59	12/21/2021	Mike	Cohen	Request	LRP Goals & Objectives	Request a more detailed financial assessment than Annual Report with a deeper dive. That will be helpful for this group moving forward, good to understand how much is for maintenance. We also need funding projections - how much is the state projecting will be available, etc. Maybe this will be part of the criteria.	Comment noted. We are working towards a more detailed and more real-time reporting of budget and expenditures.	Committee Meeting - Spoken Comment
60	12/21/2021	Mike	Cohen	Question	LRP Process	How much water is the state projecting will be available? When will it be available, this is foundational for any assessment.	Science committee and LRP committee to provide input. Will overlay expected water availability with habitat conditions.	Committee Meeting - Spoken Comment

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61	12/21/2021	Mike	Cohen	Request	LRP Goals & Objectives	State has statutory obligation to restore the Sea. It the state being driven by the Stipulated Order or but the statute. A written explanation of the state's interpretation would be helpful.	The Fish and Game Code requires Salton Sea restoration to be based on the preferred alternative, which must achieve the following three objectives: 1. Restoration of long-term stable aquatic and shoreline habitat for the historic levels and diversity of fish and wildlife that depend on the Salton Sea. 2. Elimination of air quality impacts from the restoration projects. 3. Protection of water quality. (FGC sec. 2391 and 2931.5). Section 2940 states what the Legislature hoped to achieve in settings these three objectives for Salton Sea restoration.	Follow-up
63	12/21/2021	Kerry	Morrison	Comment	LRP Process	We seem to be evaluating in two separate tracks: one is with water import, the Long Range Plan, the independent review panel and one is alternatives that Tetra Tech is looking into. It seems like without future water, none of these alternatives will work really well. Any of the alternatives would be benefited by water import. All projects need high quality water to help people and animals.	Comment noted. The long-range plan is currently focused on concepts that don't involve water importation, to allow the independent review of concepts involving water importation to conclude. At the conclusion of the independent review, the LRPC will work to incorporate results into the Long-Range Plan.	Committee Meeting - Spoken Comment
64	12/21/2021	Luis	Olmedo	Comment	LRP Process	There has been a failure in understanding diversity of stakeholders. Rather than approach from PR viewpoint this is a good opportunity to understand different stakeholders.	Comment noted. The LRPC is working with members of the Engagement Committee, which represent Tribal governments, local communities, and key stakeholder groups, to finalize an inclusive outreach plan.	Committee Meeting - Spoken Comment
65	12/21/2021	Kerry	Morrison	Comment	LRP Process	Share video link and notes from committee meetings, will there be two sessions for each meeting?	Work is not going to stop between meetings. The LRP committee will be getting requests for work through email in between meetings to review items. There may also be a need for a subcommittee to be formed at some point. . We will provide a succinct log of comments, questions, and decisions via the CNRA website.	Committee Meeting - Spoken Comment
66	12/21/2021	Jonathon	Shore	Comment	LRP Process	Will there be a shared folder with documents for people to edit, resources to be readily available?	Shared documents work when you have 5-10 people. Hard to have editable documents in a group with 40 people. Will need to think about it and come back with a proposal. Will post review documents that will go to the committee and the public.	Committee Meeting - Spoken Comment
67	12/21/2021	Chris		Comment	LRP Process	This is a public effort, the Long Range Planning Committee need to post agenda and documents one week in advance of meeting so the public can read all documents. An example copy would be the Salton Sea Authority agenda packet developed before each of their meetings. Also a notification on the CNRA listserv would be good. Two meeting format is not good, need to integrate meetings.	Comment noted.	Committee Meeting - Spoken Comment
68	12/21/2021	Chris		Comment	LRP Process	I object to Mr. Brownlie's position in evaluating different proposals. He is too close to perimeter lake position.	Concern noted; however, all work by consultants is being directed and overseen by State personnel.	
69	12/21/2021	Chris		Comment	LRP Process	The various committees need to be aware of the Bagley-Keene Act, this is a public process.	Comment Noted.	

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70	12/21/2021	Tom	Sephton	Comment	LRP Process	Issue with the amount of water available. We are here with a decision made 2 decades ago to transfer water to the coast. We are here because of destruction of habitat and recreation and quality of life. Profound environmental injustice for the benefit of people on the coast. Court said legislature did not have to appropriate funds. State has to do something with enough water that works--supports ecosystem, people, and economic damage done. This is a number one environmental justice issue for the state.	Comment noted.	Committee Meeting - Spoken Comment
71	12/21/2021	Jenny	Binstock	Comment	LRP Process	Support encouraging broad participation of community members. Community should participate beyond offering comments. Fantastic that opportunities for engagement are growing. How are we not overburdening people? Need to explore that in the Engagement Committee. Need to leverage different things happening and go beyond the limits of the SSMP mandate.	Comment noted.	Committee Meeting - Spoken Comment
72	12/21/2021	Jose	Flores	Comment	LRP Process	Supports community engagement--need to go beyond business card community, and to blue collar community who live in the area. Need to bring people from shadows to the mainstream.	The SSMP Team is committed to meaningful community engagement and implement best strategies to engage residents throughout the implementation of the SSMP. The SSMP Team has strong partnerships with regional CBOs and local entities to help deliver information and seek the resident's involvement and acquire their feedback and suggestions.	Committee Meeting - Spoken Comment
73	12/21/2021	Carl	Nettleton	Question	LRP Goals & Objectives	This thinking looks at the Sea as a liability not as a potential asset. It wants to restore the sea to what it once was, to the degree possible, within the parameters of the state order. Yet, unless water is imported from the Sea of Cortez, there isn't enough water to do that. Is the team also looking to see how the land area encompassed by the sea could be reconfigured as an asset in multiple ways, even as it meets the goals of the state order?	Proposals for water importation are being evaluated separately by an independent review panel. The panel's recommendations will be incorporated into the plan during a later phase.	Committee Meeting - Q&A
74	12/21/2021	Jenny E.	Ross	Question	LRP Goals & Objectives	With the passage of SB 32 in 2016, California committed to reducing its greenhouse gas emissions to 40 percent below 1990 levels by 2030. That goal, and the hoped-for attainment of carbon-neutrality statewide by 2045, cannot be achieved if there are significant new sources of GHGs in the state. No mention has been made in the discussion of goals and objectives or the statutory requirements relating to a long-term plan for Salton Sea of the need for the committee and the State to evaluate each potential plan with regard to the ongoing greenhouse gas emissions its implementation will produce. Some types of plans will have far greater carbon emissions – emissions that will continue for decades and beyond – than other types of plans. Will the committee ensure that the long-term plan selected is one that will cause the least significant ongoing greenhouse gas emissions (or perhaps even entail net carbon capture)?	Green House Gases will be considered as part of the process.	Committee Meeting - Q&A
75	12/21/2021	Jenny E.	Ross	Question	Other	Thanks for your response. Who will be advising the committee regarding the GHGs associated with each potential long-term plan? None of the committee members appears to have relevant expertise (and the members of the Science Committee have not been identified).	Within the broader team, including the science committee, we have sufficient technical expertise related to GHG and climate change.	Committee Meeting - Q&A

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
76	12/21/2021	Arnold	Franz	Comment	Other	I agree . Fresh water (Colorado river) will be difficult at best today and will only get tougher in the future . I would like a canal/aqueduct from the Gulf of California . It is the only viable long term plan . We would need a return back to the gulf to flush out excess salt built up over the years . On its path back to the sea the water can pass through the "Laguna Salada" area and fill Mexico's own Salton sea . Don't forget to use solar powered pumps to get over the height difference .	Proposals for water importation are being evaluated separately by an independent review panel. The panel's recommendations will be incorporated into the plan during a later phase.	Committee Meeting - Q&A
77	12/21/2021	Kerry	Morrison	Comment	Other	Colorado River is running out quickly. Having sufficient water is our VERY BEST TOOL. Without it, we would be planning to not grow and to desertify. With water we have habitat, health, economy and a future in the region.	Comment noted.	Committee Meeting - Q&A
78	12/21/2021	Arnold	Franz	Question	Other	Is salt water from the sea an option ?	Proposals for water importation are being evaluated separately by an independent review panel. The panel's recommendations will be incorporated into the plan during a later phase.	Committee Meeting - Q&A
79	12/21/2021	Carl	Nettleton	Question	LRP Timeline	You mentioned the timelines is tight for community engagement plan ... what is the approximate timeline? Thanks!	Hi Carl, this is being discussed now. The community engagement plan is being developed now and shared as soon as possible. The State has until the end of 2022 to submit the Long-Range Plan to the State Water Board and we would like to get community input from the very beginning of the process.	Committee Meeting - Q&A
80	12/21/2021	James	Blair	Comment	Community Engagement	Happy solstice! I am an assistant professor in Geography and Anthropology at Cal Poly Pomona and would be glad to support in any way, particularly on these questions about defining community and/or stakeholder (as well as Luis' excellent ideas about citizen science). Here's my e-mail: jblair@cpp.edu. Here are some potentially helpful references on different notions of "community" in relation to resource management: Brosius, J. Peter, Anna Lowenhaupt Tsing, and Charles Zerner. 1998. "Representing Communities: Histories and Politics of Community-Based Natural Resource Management." Society and Natural Resources 11: 157–68. Watts, Michael. 2004. "Antinomies of Community: Some Thoughts on Geography, Resources and Empire." Transactions of the Institute of British Geographers 29 (2): 195–216.	Thank you James for sharing this information with us!	Committee Meeting - Q&A
81	12/21/2021	Luis	Olmedo	Comment	Community Engagement	Science, design, criteria can and should co-design/co-create with more community.	Comment noted.	Committee Meeting - Zoom Chat
82	12/21/2021	Claudia	Sherman	Comment	LRP Timeline	Agree with the caller, that is a really confusing characterization and makes it sound like the committee can kick the cab down the road until the Sea dries up	It is not the intention to kick the can down the road. We are just trying to say that we are looking for long term solutions that end at any specific date.	Committee Meeting - Zoom Chat
83	12/21/2021	Michael	Cohen	Comment	LRP Process	The 1998/99 SSA/Reclamation feasibility assessment should also be reviewed, especially its screening and evaluation criteria.	Mike, I didn't mention the 1998/99 SSA/Reclamation work because it was done before the QSA and so much changed since then.	Committee Meeting - Zoom Chat
84	12/21/2021	Kerry	Morrison	Comment	Other	It seems like almost any in-sea alternative, including a perimeter lake would do best to have enough water. The waning & polluted rivers may not be appropriate for a sustainable shoreline.	Comment noted.	Committee Meeting - Zoom Chat

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
85	12/21/2021	Kerry	Morrison	Question	Other	What's in report from Army corps of engineers, were doing a NEPA assessment for alternatives - stipulated order from SWRCB. When is the formal NEPA report being released to the public?	A public Draft of NEPA for the 10 year plan is anticipated in the Spring of 2022.	Committee Meeting - Zoom Chat
86	12/21/2021	Luis	Olmedo	Comment	Community Engagement	CCV ready to help outreach	Comment noted.	Committee Meeting - Zoom Chat
87	12/21/2021	Kerry	Morrison	Comment	LRP Process	If Tetra Tech likes a project, do they get to build it?	Tetra Tech has significant conflict of interest restrictions about bidding on projects. For example, we were specifically restricted from bidding on any aspects of the Species Conservation Project.	Committee Meeting - Zoom Chat
89	12/21/2021	Jenny	Binstock	Comment	Community Engagement	Some input: there should be wide promotion of the LRPC and an invitation for community members to join as members of the committee, to ensure it is diverse and not just the usual players. That would provide a layer of outreach and meaningful engagement that can't be captured by the state selecting participants themselves	We feel the Long-Range Plan Committee should be comprised of the varied interests represented by Salton Sea communities including the following: Tribal Governments, Regional & Local Agencies, Community Based Organizations, Agricultural Groups, Farmworker groups, and Governmental Agencies.	Committee Meeting - Zoom Chat
90	12/21/2021	Luis	Olmedo	Comment	Community Engagement	Identify all stakeholders , create subgroups to develop sections by capable experts reaching identified stakeholders groups	Comment noted.	Committee Meeting - Zoom Chat
91	12/21/2021	Tom	Sephton	Comment	Community Engagement	Use the Engagement Committee to take LRP and Science Committee evaluation criteria out to the community around the Salton Sea for review and comment. Solicit input from the community about what the long range goals and objectives should be. A bottom up approach will come up with some different goals than the agency only top down approach.	Comment noted.	Committee Meeting - Zoom Chat
92	12/21/2021	Kerry	Morrison	Request	Community Engagement	Videos of committee meetings and meeting minutes could be shared on CNRA website.	We will post presentations and a succinct log of comments, responses, and decisions from the Long-Range Plan Committee meetings to https://saltonsea.ca.gov .	Committee Meeting - Zoom Chat
93	12/21/2021	Jenny E.	Ross	Request	Community Engagement	Will the documents that committee members will be discussing during meetings be publicly available?	Documents will be made available to the public in most cases after the LRPC has had an opportunity to provide input. In some cases, the documents will be made available concurrently. Documents will be posted to https://saltonsea.ca.gov .	Committee Meeting - Zoom Chat
94	12/21/2021	Jenny E.	Ross	Request	Community Engagement	Thanks, James. It would be great if the documents the committee will be discussing during each meeting could be made publicly available in advance of each meeting (perhaps at the time the meeting is announced).	Thank you Jenny, we aim to do that for the next meetings	Committee Meeting - Zoom Chat
95	12/21/2021	Kerry	Morrison	Request	Community Engagement	Are we able to have the agenda packet together and posted a week before like Chris had mentioned? Even a 1 pager is a help to keep our team and the public in the loop.	While we strive to do this, it isn't always feasible.	Committee Meeting - Zoom Chat

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
96	3/2/2022	Kerry	Morrison	Question	LRP Concept: General	Question about way that process is going regarding long range plans. If Tetra Tech is presenting concepts when long range plans are supposed to be an independent review - I want to get it straight that Tetra Tech is reviewing plans without water. They're going to review other people's plans and then they draft the final project. To me, that sounds like preferential treatment and a conflict of interest. It should be the state and not an independent contractor.	James: We're not sure what we're going to receive from the Long Range Plan. It's a little bit different in my perspective in terms of who is driving the LRP. The state is driving the process. the way we are stepping through the process I've adapted through the last several projects I've worked on and I'm implementing on this team. Bill: There is not a conflict of interest because Tetra Tech does not have a vested stake in the state plan. We don't have a stake in any particular concept.	Committee Meeting - Spoken Comment
97	3/2/2022	Joan	Taylor	Question	LRP Concept: General	Question about scope which I raised as an appointee to the former LRP committee and at the independent review. Because there seems to be an all or nothing approach to importation and it's unclear what role this committee will have in picking concepts as opposed to consultants and I continue to advocate that we look at an alternative that falls within refilling the Sea entirely and no importation, in other words, look at a concept that is partial importation on an as needed basis based on the drought and potential inquiries in the Sea.	We'll get to this a little bit later. There was the process to get new concepts to the science panel and there will also be that in this process. I'm not sure where this will live but will be addressed later.	Committee Meeting - Spoken Comment
98	3/2/2022	Luis	Olmedo	Comment	Community Amenities	It's important to maintain the priority of public health because the ecosystem is at a crisis. The Salton Sea is not a protected water body so the public health element of it is critical and it's behind schedule. Things are accelerated now but there's still a lot of catch up on things that haven't been done in the past. I'm not against the idea about water imports, but I'm very nervous that if this isn't a real financial commitment, I would hate for these dollars to be siphoned off for trying to create or align the politics or create plans that may never be able to be implementable because we're still not seeing the billion dollar investments in the Salton Sea. We had 5 billion dollars on the budget and I said go for it, invest deeply in water importation. I'm not against it, but focused on the health crisis we have in front of us right now. One thing that this whole new enthusiasm for the new economy out here: geothermal has been here for decades but apparently lithium is going to be a whole new element. There are a lot of frameworks already proposed for community benefits agreements. There is a great opportunity here for the state to create framework to ensure there are community benefits. I think this is a great opportunity to build these things into whatever development is happening right now. Maybe bring community benefits infrastructure to make sure that these investments aren't just exclusive for the lithium and geothermal but for any project around Salton Sea.	Thank you for sharing that perspective.	Committee Meeting - Spoken Comment
99	3/2/2022	Chuck	Parker	Comment	LRP Concept: General	I think that due to the fact that it's taken 20 years to start doing anything to help restore the Salton Sea, the conditions have changed dramatically and there are a bunch of reports that came out in the last couple of months illustrating that. One of them is on the potential of GHG emissions from various proposed long range plans authored by Jenny Ross.	The SSMP team received the report from Ms. Ross and will review it as part of this process.	Committee Meeting - Spoken Comment

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
100	3/2/2022	Chuck	Parker	Question	LRP Concept: General	There's another report by a group of attorneys to reform state water laws because projections for inflows anticipated may be incorrect. The state water board bases their projections on past water flows. Are you taking into account that problem that the way that the way you estimate water inflows is based on what it's in the past and that's unlikely in the future because of the drought?	James: That will be part of our evaluation criteria as we step into the feasibility components of these projects. Bill: We will definitely going to have to look at the water inflows and I mentioned the hydrology modeling. We're not prepared to do that today but that's what we're going to be working on for the next couple of months.	Committee Meeting - Spoken Comment
101	3/2/2022	Michael	Cohen	Question	LRP Process	What's the deadline for submitting ideas?	April 2 is the deadline but it will be a rolling basis as well.	Committee Meeting - Spoken Comment
102	3/2/2022	Michael	Cohen	Question	LRP Concept: General	Some of the questions on here talk specifically about the hydrology model which seems like we're asking for a deadline prior to the release of the hydrology models so I'm wondering how we can sync those processes. In requesting additional ideas and input, the information requested relies on hydrologic modeling. So calls for we're all doing our own hydrologic modeling, but it would be better for us to all work on the same model. Maybe there's a way to release interim estimations so we can get a sense of what you're looking at and how that varies from other models, particularly inputs.	Bill: Unfortunately, we're under a very difficult timeline. We're trying to complete this process by December. Once we do the hydrology modeling, you'll have a chance to comment on that as well. James: We need to allow for some iteration to occur as we get more information. We should think about these things at a more higher level detail for now. To the extent you have an idea that you know would be more successful under a more bleak water availability condition, then that would be the type of idea to try to work on and develop those aspects. As we get more information, we'll be able to further refine any of these concepts.	Committee Meeting - Spoken Comment
103	3/2/2022	Michael	Cohen	Question	LRP Concept: General	Are you reviewing energy requirements as part of these proposals and if so, could that information be shared?	We will be but don't have any information to share at this time.	Committee Meeting - Spoken Comment
104	3/2/2022	Michael	Cohen	Request	LRP Concept: General	To the extent that Bill or others can release hydrological information as it comes would be preferred, so that committee does not have to wait until June before identifying viable concepts.	We will be releasing information as soon as it is available for review.	
105	3/2/2022	G. Patrick	O'Dowd	Comment	LRP Concept: General	Hard to understand how we can even advance these concepts without starting without a baseline of what the flows look like and what the ability to use that water looks like. The Authority did put together the perimeter lake plan and looked at other plans. The information we've received since the plan was developed was perhaps there's not enough water for that plan. Understand that we have revisited in the past and perhaps it's not a bad idea to push concepts once we have that understanding, but it's a pretty critical item that I don't see how we develop projects until we know what resources we have to do that with.	Bill: It's a good point but we have to start out with concepts that we can run the model on. James: Through our evaluation, we have to look at how inflows will play out in these concepts. We are trying to review a range of these concepts and then see what kind of benefits each of those concepts would provide given the available water. That is a key piece we need to work on and will work on as soon as possible.	Committee Meeting - Spoken Comment

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
106	3/2/2022	Tom	Sephton	Question	LRP Process	With respect to submitting ideas, are there any limitations on who is allowed to submit concepts and who do they go to?	The only constraint on ideas that we're looking at evaluating right now are ones that don't involve water importation and no compensation will be offered. I know there will be some interest in hybrid approach of not a full blown importation project. We need to hold off until the Independent Review Panel provides their report back to us before we can select any modular approach for those two fashions. For now, only reviewing concepts that don't involve water importation	Committee Meeting - Spoken Comment
107	3/2/2022	Tom	Sephton	Question	LRP Concept: Pump Out	With respect to the pump out concept you proposed, at what point in the project would brine be sent to the Sea of Cortez and where in the Sea of Cortez are you delivering it and dispersing it? At what point in the compound process would you get to Phase 2 where you would be pumping brine to Mexico? What would you do to get people in Mexico to accept that waste material? How would you screen out organisms unique to Salton Sea like barnacles?	There is a map in the draft document that we submitted that shows a possible pipeline route. Preliminary modeling that I've done is that it would take a long time to get the salinity in the Sea back down to a marine level that would support fish habitat. We haven't completed the modeling but know it's a fairly long timeline.	Committee Meeting - Spoken Comment
108	3/2/2022	Howard	Elmore	Comment	LRP Concept: General	There is soil along the Sea that has never been researched other than the surface. There's a lot of really good land that could be moved back into agriculture. There's probably some ground that would be great for dust suppression. A study of the first three,. four feet would give us a lot more information.	There's been a bit of work on soils. There was a survey on nearshore sediments conducted about 20 years ago. There was soil information and other geotechnical data collected for the SCH Project. We've done some more recently out by the Torres-Martinez area and there were two separate geotechnical investigations done from jack-up barges in deeper areas within the Sea. It is definitely possible that some of the areas around a smaller Sea could be reclaimed. For the Mid-Sea Barrier concept, the seaside communities could reclaim the land along the shore and build in the direction of a reduced Sea.	Committee Meeting - Spoken Comment
109	3/2/2022	William	Patterson	Question	LRP Concept: Pump Out	For Pump Out concept, on #4 you discuss distribution system. Can you elaborate on that and the number and locations you anticipate under this option and how that relates to the habitat and terminus of drains currently on playa?	Concept is that you would have a number of small pumping plants. The Brine with Shallow Flooding Backup is an approved Best Available Control Method (BACM) at Owens Lake. Brine in shallow could be used to create a crust that would then control dust. If it became emissive, then you would have to re-wet it. A number of small pumping plants would be used to create a mosaic of ponds around the Sea. At this point, it's only a concept so even further development is needed.	Committee Meeting - Spoken Comment
110	3/2/2022	William	Patterson	Question	LRP Concept: Pump Out	For Pump Out concept, Is there any idea of the number of pumping plans this is representing?	I was thinking 20 to 25. Each one of them would take around 2-4,000 acre-feet per year. The pump sizes would not be very large.	Committee Meeting - Spoken Comment
111	3/2/2022	Luis	Olmedo	Comment	LRP Concept: Pump Out	The Pump Out at the Salton Sea concerns me because we don't want to just transfer the toxics of one community into another. That's totally against environmental justice. Any time there's a proposal where we're transferring waste to another place is completely against environmental justice principle. We should have do no harm. CNRA should create guidelines on how it will do no harm or create negative consequences.	WE understand that those factors will need to be considered.	Committee Meeting - Spoken Comment

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
112	3/2/2022	Luis	Olmedo	Question	LRP Concept: Pump Out	Unsure if concepts reviewed are recycled from before or new?	There is a source material document that went out for review that describes how this initial suite of concepts were developed.	Committee Meeting - Spoken Comment
113	3/2/2022	Nilda	Ruiz	Question	LRP Concept: Pump Out	Regarding pumping out water, water quality at Sea is more than just salinity, there is agricultural runoff and pesticides and fertilizers. In the concept, is there any filtering that would be involved?	It has a high level of nitrates and phosphates. Pesticides are actually fairly low. There is preliminary discussion in the document that water quality in the pipeline would have to be considered.	Committee Meeting - Spoken Comment
114	3/2/2022	Michael	Cohen	Question	LRP Concept: Pump Out	Talking about costs per acre, I wonder how you are quantifying benefits per acre?	Haven't developed the full scoring rubric yet but will probably be comparing habitat types, so it will be a relative comparison.	Committee Meeting - Spoken Comment
115	3/2/2022	Luis	Olmedo	Comment	LRP Evaluation Criteria	Noticed that public health is second and that kind of baffles me because it falls after wildlife and habitat. Those things are important and I know that the ecosystem needs to be healthy for people to be healthy. It wasn't until 2016 that we finally had a break through at the Water Board. Just want to acknowledge that public health does need to be its own priority.	Public health issues are being addressed within Acceptability criteria.	Committee Meeting - Spoken Comment
116	3/2/2022	Luis	Olmedo	Comment	Community Engagement	We have been working with CNRA on community engagement. If there is a desire or request to add to the work that CCV is doing, glad to bring updates when these community workshops are scheduled.	Comment noted.	Committee Meeting - Spoken Comment
117	3/2/2022	Kerry	Morrison	Comment	Community Engagement	Every year EcoMedia Compass hosts an Earth Day event on Saturday, April 23. Currently looking for speakers for community engagement.	Comment noted.	Committee Meeting - Spoken Comment
118	3/2/2022	Chuck	Parker	Comment	LRP Evaluation Criteria	Want to emphasize that an additional criteria needs to be added for judging projects' effectiveness, which is the potential for GHGs. This would apply to effectiveness, economic recovery, and social justice. Administration is focused on lithium, so this criteria of GHG emissions needs to be incorporated and looked into.	We have added a GHG criterion.	Committee Meeting - Spoken Comment
119	3/2/2022	Chuck	Parker	Comment	LRP Concept: General	Heard several times references to Owens Lake. Owens Lake is not a good model for the Salton Sea. It's cost about \$3B and it's still an ongoing source of funding. Bringing water in from the sea is the only way to fulfill all criteria.	It's lessons learned. We are not trying to repeat what was done there, but we can learn from it.	Committee Meeting - Spoken Comment
120	3/2/2022	Luis	Olmedo	Comment	LRP Concept: General	When we put public health in the forefront, we can create proactive measures to protect themselves.	Public health issues are being addressed within Acceptability criteria.	Committee Meeting - Spoken Comment
121	3/2/2022	Tom	Sephton	Comment	LRP Concept: General	The report from Ms. Ross about GHG emissions from exposed playa and certain types of projects proposed should be taken seriously. It is important to be considered but has not been considered. It is important to note that as the Sea is exposed, and as you start digging into it to reduce dust blowing into the air, you are exposing stored carbon. That is a significant GHG contributor and significant contributor to climate change. Also missing a measurement of GHG emissions from Salton Sea playa. There are other measures of other lakes that have dried up but not of the Salton Sea itself. We need to quantify how much of an issue it is.	We plan to include GHG and climate change considerations in our evaluations.	Committee Meeting - Spoken Comment

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
122	3/2/2022	Rob	Simpson	Comment	LRP Concept: General	I talked with USGS and people that are familiar with the aquifer at the northern end of the Coachella Valley aquifer. There is a distinct possibility that while the river was flowing, it deposited a lens that muds of Lake Cahuilla may not have entirely cut off. They might be exposed and drained into the Sea if we lower sea level at Salton Sea by another 15 ft. NASA looked at rapid sea level rise on the West Coast for all US Cities - for the same reasons, the waters at the mouth of the Gulf of CA are probably going to rise by a half meter during the 2030s during the lunar standstill, where the earth, moon and sun get close in alignment at the equator and the earth's rotation. Tidal amplification at the Gulf is going to make tide levels at the northern part of the Gulf to rise by a meter. This will have implications on any possible importation from Sea of Cortez. It also makes flooding of Laguna Salada to levels somewhat close to the 1984 flood of Laguna Salada highly probable. I would like to have further discussions about that paper with anyone who can listen.	Comment noted.	Committee Meeting - Spoken Comment
123	3/2/2022	cockroft@graffiti.net		Question	LRP Evaluation Criteria	Wondering why we are using different one criteria for the LRP non-water concepts and a different one for the Independent Review Panel. It'll be harder to integrate both later than to use the same one now. You're already on a tight deadline.	The Independent Review Panel have received basic information from the SSMP team, but they have been directed to work independently and develop criteria appropriate for water importation projects.	Committee Meeting - Spoken Comment
126	3/2/2022	Ed	Luna	Comment	LRP Concept: Pump Out	Let's say some of the projects become available, I'm concerned about a comment that was made earlier about dead zones or anaerobic areas because of the term diffusers. I relate diffusers to diffuse oxygen into the water and minimize the possibilities of dead zones. That tells me that any option may provide the option anaerobic situations which would potentially increase the possibility of hydrogen sulfide gases in the air. That's already a problem around the Salton Sea is the offensive odors. If that's even a remote possibility, and if any of the projects are going to contribute to this then we need to explain the concept a little further.	Whenever a desalting plant is constructed near an ocean, you have to figure out how to discharge the brine into the receiving waters so that it doesn't create a dead zone or a problem area. If we were to discharge into the Gulf of CA, we'd have to figure out a system of ponds or something where the water can be blended down before it's discharged. I agree that designing an appropriate discharge system would be a significant engineering challenge.	Committee Meeting - Spoken Comment
127	3/2/2022	Nathan	White	Comment	LRP Concept: General	It would be great if there was a grant program for smaller scale programs. There was a financial assistance program at the Sea in 2012. Programs like that were really successful because they could get more interest, bigger projects too through funding mechanism.	Comment noted.	Committee Meeting - Spoken Comment
296	7/6/2022	Tom	Sephton	Comment	LRP Concepts	I'd like to note that 7B and 7C while, not part of my original proposal created by perhaps Tetra Tech are very, very similar to something I just spent two very intensive weeks on submitting to the Independent Review Panel and 7C certainly looks like an almost exact duplicate of my Concept C that I submitted to them days ago. And 7B was also my Concept K that I submitted days ago. So I would appreciate the opportunity to confer with the people creating these proposals to make sure that they do in fact make sense. And just wanted to state that since various variations are being put out there, those of us who proposed plans originally should have some ability to contribute to variations that have worked for example, desal, assuming that solar desal only can happen during the hours as the sun is shining is not necessarily true. We're aware that you desal plants operate far more efficiently if they run 24 hours a day and there are schemes to be able to enable that such as pumped storage hydro, which would enable a coupled with solar would enable 24 hour operation or storage of heat overnight, which would also enable that.	Point noted for future consideration.	Committee Meeting - Spoken Comment

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
297	7/6/2022	Joan	Taylor	Question	LRP Criteria: Effectiveness	I'll just comment on the pupfish that we may have some competing interests here.	A pupfish criterion is included.	Committee Meeting - Spoken Comment
298	7/6/2022	Joan	Taylor	Question	LRP Criteria: Effectiveness	I would seek some clarification on the effectiveness having to do with biological effectiveness. One thing just as a general matter, this final "scores for other concepts scale proportionally rounded to the nearest integer," is, are you talking about grading on the curve somehow? Could you explain what that means?	For effectiveness, the best performing concept will score a 5 and the worst performing concept will score a 1. Scores for other concepts will be quantified based on their proportional relationship to those other scores. Scores will always be rounded to the nearest integer. While this may be perceived as a coarse approach, there will also be a narrative to provide additional detail for each concept.	Committee Meeting - Spoken Comment
299	7/6/2022	Joan	Taylor	Question	LRP Criteria: Effectiveness	The language used scores for other concepts - concepts will be scaled proportionally. Proportionally to what?	If we take "area of shallow water habitat" as an example, proportionally means that if a concept with the greatest area of shallow habitat is scored 5 and the smallest is scored 1, a concept in between would score a 3.	Committee Meeting - Spoken Comment
300	7/6/2022	Joan	Taylor	Comment	LRP Criteria: Effectiveness	You could say, shallow flooding has the greatest areas of habitat, largest physically. But if you do that everywhere, you get a great score, but you wouldn't do anything for piscivorous birds. So, I would suggest that there be some extra weight given to the deepwater, it appears to be the thing that's going to be in the shortest supply. So I just think doing it by pure area is too simplistic.	The concern about deep-water habitat is noted. In the revised criteria, we have three separate measures for habitat that is shallow, medium, and deep-water habitat, so all three will be independently scored. We will not be weighting at this time but can consider that approach in the future if deemed necessary.	Committee Meeting - Spoken Comment
301	7/6/2022	Joan	Taylor	Comment	LRP Criteria: Effectiveness	I would say that, you know, you could have a huge area of shallow habitat, the huge length of shoreline and do nothing for the deep water and have predominate in the scoring, I don't think that that would reflect the kind of results we're seeking. Even though the state hasn't set goals, they do need to preserve all the different types of habitats.	In the revised criteria, we have three separate measures for habitat: shallow, medium, and deep-water habitat, so all three will be independently scored.	Committee Meeting - Spoken Comment
302	7/6/2022	Tom	Sephton	Comment	LRP Criteria: Effectiveness	I do concur with Joan's point that you're essentially getting a 2/3 favorable rate or higher valuation for shallow habitat by having both length of shoreline and shallow habitat and 1/3 for deepwater. At the same time, it can be noted that piscivorous birds, even brown pelicans, are capable of feeding in shallow water. I certainly hope we have substantial deep water but we've seen them ground pelicans surface feed at the Yacht Club harbor.	In the revised criteria, we have three separate measures for habitat: shallow, medium, and deep-water habitat, so all three will be independently scored.	Committee Meeting - Spoken Comment
303	7/6/2022	Tom	Sephton	Question	LRP Criteria: Effectiveness	I actually want to ask a question about the water quality. And that had to do with rating the water quality of peers that you're rating it on the basis of controlling nutrient inflow. You are grading it on the basis of nutrient inflow, but it's not eutrophication that is necessarily killing off the ecosystem that we've got, it's mostly salinity. And I want to ask how that's going to be scored as a part of water quality. Salinity is definitely a water quality issue and having very high salinity not only as a direct problem for fish trying to remove the chloride from their system, it also reduces the oxygen carrying capacity of the water which, which then also contributes to die offs of fish. So how are you factoring the salinity and oxygenation in the water quality? It's not just about nutrients.	We agree, and controlling salinity is a key factor in the habitat criteria. We are adjusting the wording of those criteria to salinity targets a specific criterion for the primary habitat in each restoration concept. For the water quality metric, we will evaluate the benefits of restoration concepts that reduce nutrients and other contaminants.	Committee Meeting - Spoken Comment

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
304	7/6/2022	Tom	Sephton	Comment	LRP Criteria: Effectiveness	Back when we used to have enough fish to have fish die offs, the day before a huge fish die off, you could go out to where the drains run into the sea and you would see fish congregating around the drains and gulping air to get air into their gills because there was not enough oxygen in the water. And the next day you would see masses of fish on the sea. Oxygenation is an issue.	At this time, we are unable to model dissolved oxygen for each concept, however dissolved is heavily influenced by controlling nutrients, which is part of our evaluation under the water quality criterion.	Committee Meeting - Spoken Comment
305	7/6/2022	Mariela	Loera	Question	LRP Criteria: Acceptability	How will you determine to the extent that concepts will actually provide the amenities that you're measuring like workforce, sustainability, and environmental justice? Is this going to also include community consultation, just like it includes tribal consultation?	We are conducting community workshops on Sept 1, to solicit information on amenities to be considered.	Committee Meeting - Spoken Comment
306	7/6/2022	Mariela	Loera	Question	LRP Criteria: Acceptability	When it comes, for example, to workforce, I think it's important to point not just to, for example, measure how many jobs a concept is going to create or something like that, but whether or not those are actually accessible and fit the needs of the local community. How are you going to ensure that it gets a five, but if it gets a five according to acceptability of local polls?	We will evaluate the types of employment associated with each concept and compare it to the local economy and job market.	Committee Meeting - Spoken Comment
307	7/6/2022	Mariela	Loera	Question	LRP Criteria: Acceptability	If there's any language as to how you're going to make those decisions or language that you're going to rely on, can that be shared?	A document describing draft criteria was provided for review and comment by the LRPC.	Committee Meeting - Spoken Comment
308	7/6/2022	Mariela	Loera	Question	LRP Criteria: Acceptability	Will there also be community consultation?	Community feedback is collected through public workshops (Next one occurring Sept 1.), public comment at the close of Long-Range Plan meetings, and through emails submitted to cnra-saltonsea@resources.ca.gov	Committee Meeting - Spoken Comment
309	7/6/2022	Kerry	Morrison	Question	LRP Criteria	Is there going to be any point where this committee specifically will be reviewing that the Army Corps is doing on their own track? We don't really talk about that much, but they're doing some work that's really likely going to affect what we're influencing here somehow.	The State's SSMP Team worked with the Corps of Engineers on the recent Draft Environmental Assessment for the 10-Year Plan. We plan to continue working with the Corps on the next phase of their <u>feasibility analysis</u> .	Committee Meeting - Spoken Comment
310	7/6/2022	Joan	Taylor	Question	LRP Process	Are the comments we're making here being recorded or written? Or do we need to reiterate our comments in writing?	We take notes, and I'll say we're better at taking notes than posting our responses to the CNRA website. But I think we've made it through meeting two, at this point. There has been a delay in getting those comments <u>posted to the website</u> .	

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
311	7/6/2022	Kerry	Morrison	Comment	LRP Criteria: Efficiency	As far as efficiency and cost, I understand that we need to value cogs. And when we have a project worth believing in - something big enough, worth justifying and asking from the state of California for significant budget, it makes sense to not beg for peanuts here, you know, it seems like this region forever has been begging for scraps. And there's some sort of mindset that it's not worth it. But we're putting together a project worth believing in for future generations. So let's know that what we're putting here is worth the odds. And in that cost metric, there was a kind of a pass or fail like everything else, but I don't know if we are taking into account something like Michael's hazards toll, where if we don't do a good job here, we're going to be paying 10s of billions of dollars in future money due to emissivity, health problems, environmental degradation, real estate degradation, all of these different things, and it has toll study. So I don't know if there's a way to really adjust the criteria on that. But let's put something worth asking for. Know we're worth it, and offset future damages. And I don't know what else to say there. But this is worth it. California has that 100 billion dollar surplus -ish now, I don't know if we're ever going to have that again. And let's, let's do a good one and not just scrape for peanuts here.	In terms of cost and efficiency, we are trying to identify a range of potential solutions that maximizes the benefit for whatever expenditures are made.	Committee Meeting - Spoken Comment
312	7/6/2022	Tom	Sephton	Question	LRP Criteria: Efficiency	Is cost being evaluated as just gross cost only? Or is it being evaluated at net cost, because some of the projects will have revenues, in addition to costs. So if it's a net cost, then that makes sense. But if you're taking a project that proposes revenue, and not considering the revenue, not subtracting the revenue from cost, then you're essentially going to have a completely bogus analysis of the concept because you're just going to look at cost alone, be that capital or operation and maintenance.	We will consider potential revenue generation as an offset for the Operation, Maintenance, Energy and Replacement (OMER) Cost.	Committee Meeting - Spoken Comment
313	7/6/2022	Tom	Sephton	Question	LRP Criteria: Efficiency	You've stated that to get a score of five, you have to use technology that's been done in California at a large scale. Why does it make a difference whether it's done in California, or Nevada, or Saudi Arabia, or France or wherever, I don't see why implementing it in California makes any difference whatsoever, unless it's actually been tested at the Salton Sea, of which very little has been done at the Salton Sea, because we're 18 years after the QSA, just getting started now. So why is California a differentiator versus just technology that's been demonstrated in other places, and could be applied to the Salton Sea?	In response to comments, we have changed the language for the criterion: Proven Technology/Reduced Risk. We have deleted the reference to technology used in California.	Committee Meeting - Spoken Comment

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
314	7/6/2022	Tom	Sephton	Question	LRP Criteria: Efficiency	Why is it that things that have actually been demonstrated even at a small scale at the Salton Sea are off the table technology wise? That makes no sense to me.	We have reviewed the more detailed written comments on this criterion and have re-worded the criterion. The updated criterion reads as follows: "Concepts that employ common technologies, with proven low risk performance will be given the highest score of 5. Concepts that have technologies that have been used elsewhere but not necessarily in highly seismic areas such as that of the Salton Basin or on such a large scale as at the Salton Sea will be given an intermediate score of 3. Concepts that have technologies that have not been widely used elsewhere and not used on any large scale like that needed at the Salton Sea will be given the lowest scale of 1. Concepts that employ a mix of technologies with varying maturity may be assigned intermediate scores."	Committee Meeting - Spoken Comment
315	7/6/2022	Tom	Sephton	Question	LRP Criteria: Efficiency	Applying only things that have been developed in California to get a high score really makes no sense whatsoever because information travels across state borders and international borders. And there's no logical reason to limit it to things that have been developed in California. The Salton Sea as a unique body of water with a unique water chemistry and a unique ecology and fairly unique cultural environment of being a border community with all kinds of cultures involved. But with respect to technology, taking things that have been developed in other places and applying them to the Salton Sea, actually requires a testing and development process. And if you take the fact that somebody's taken something that's been shown elsewhere, but actually applied it to the Salton Sea, and figured out how to make it work at the Salton Sea, and if that is applied as a negative, as a way to eliminate a technology, because you actually took something established at large scale elsewhere, and showed at a smaller scale, how to make it work at the Salton Sea, to say that you get a score of one for doing that is completely ridiculous.	In response to comments, we are changing that language about giving preference to technologies proven in California. The updated criterion reads as follows: "Concepts that employ common technologies, with proven low risk performance will be given the highest score of 5. Concepts that have technologies that have been used elsewhere but not necessarily in highly seismic areas such as that of the Salton Basin or on such a large scale as at the Salton Sea will be given an intermediate score of 3. Concepts that have technologies that have not been widely used elsewhere and not used on any large scale like that needed at the Salton Sea will be given the lowest scale of 1. Concepts that employ a mix of technologies with varying maturity may be assigned intermediate scores."	Committee Meeting - Spoken Comment
316	7/6/2022	Howard	Elmore	Comment	LRP Process	I'm hoping you might email the projects you listed at the start of the session today, with some sort of description, and along with that you're scoring sheet.	We will share the fact sheet with the LRPC.	
317	7/6/2022	Howard	Elmore	Comment	LRP Criteria: Efficiency	We're talking about the amount of water and your number six was most pessimistic. I think that in the new norm on the river, that might be very optimistic. It was pointed out that we have 2 to 4 million acre feet that the Bureau wants to save this year. The history of the river is that when they divided it up, it was a very wet period, and they came up with 14 million plus acre feet of water divide. Most of the researchers looking at longer periods have come up with maybe only 12 million acre feet of water. Agriculture is restricted more and more and there's going to be more efficiencies put in place. This will mean less water going into the sea.	We understand that water inflows must be evaluated carefully. We are currently considering dropping more optimistic scenarios and adding more pessimistic scenarios.	Committee Meeting - Spoken Comment

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
318	7/6/2022	Chuck	Parker	Comment	LRP Criteria: Efficiency	I really don't think it's a good idea to use the one that says it provides incremental benefits with incremental funding. I think that is saying that, if a project can be built in small pieces over a long period of time, as funding becomes available. That approach has been the approach that the state has taken for over 15 years. It's my understanding that when the study was released in 2006 or 2007, and the proposal to build the perimeter lake was thrown out there, and also some other variations on that, the basic problem was that none of the legislators or administrators who were in charge of finding funding for those projects actually made an earnest effort to do that. And that's not my opinion, that was something that was published by the state, I think it's called the State Auditor's Office. And so I think, actually, to rate a project, which bases itself on the incremental approach, is going is a bad thing. Not a good thing. It's a, it's a detraction to the project, because what you'll end up getting is what we've gotten for the past 20 years, which is, nothing gets done. Someone can always make an excuse that there's no money. And then even when money is appropriated like right now, at least for two or three years, this Salton Sea Management Plan has been, has been sitting on over \$200 million and doing very little with it. I understand that it takes a while to gear up and all that. But the other bad side of using incremental funding is that usually this is done with bond money, or borrowed money, which means that a project that you build with \$200 million of bond money is actually going to cost the people of California a lot more than that. I'm not a banker, I don't know, but you know, two or three times that amount, when you actually pay that loan back. So I think that that criteria should be reconsidered, because a project that could be funded and completed quickly and not incrementally is really what we need at the Salton Sea.	State projects are typically funded in increments by fiscal year. All other things being equal, we believe there is some merit to consider that if we get incremental funding, there will be incremental benefits.	Committee Meeting - Spoken Comment
319	7/6/2022	Michael	Cohen	Comment	LRP Criteria: Efficiency	My recollection for an alternative is it had a \$9 billion price tag. And that's why the legislature balked. So it was not a case of incremental funding, but the opposite - that the preferred alternative from 2006 or 2007 wouldn't function until the whole thing was built. And then nobody got excited about funding anything at that level. So the idea of incremental criterion is to simply say, something's better than nothing, and nothing up until the Species Conservation Habitat started construction, essentially, what we have. So it's recognition of those benefits.	Agreed. Comment noted.	Committee Meeting - Spoken Comment
320	7/6/2022	Michael	Cohen	Comment	LRP Criteria: Efficiency	I would agree with Tom that just because something doesn't happen in California, doesn't mean it doesn't exist. It's kind of a weird, California centric approach to technology. So I second Tom's suggestion that things that are proven elsewhere to be applicable in California.	Agreed, we have changed the description of that metric to remove the reference to application in California.	Committee Meeting - Spoken Comment

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
321	7/6/2022	Michael	Cohen	Comment	LRP Criteria	My suggestion is that the various criteria developed here be applied to the 10-Year Plan, as a baseline, because I think that could be instructive as we move forward to see how some of the other concepts and strategies would be evaluated moving forward. I think it'd be instructive, at least for me, and possibly other members of the committee and possibly the public to see how it actually plays out. And that might help refine some of the criteria or might be illuminating in terms of what scores highlight, but doesn't score highly. It's a good way to judge what's actually been developed to date.	Agree, we plan to score the baseline.	Committee Meeting - Spoken Comment
322	7/6/2022	Joan	Taylor	Comment	LRP Process	I would request that we get all materials in advance. And we did get these four criteria, but we didn't see your concept list. And even if it were just the day ahead, I think it makes the committee function better.	Point noted for future meetings.	
323	7/6/2022	Joan	Taylor	Comment	LRP Process	I think we're going to need to have a way to get the consensus of the room, so to speak, particularly when it comes to weighting these concepts. Efficiency, for instance, you know, the simple dust control would win hands down, all over the place. So that's going to be a difficult conversation. And we need to have some way of discussing among ourselves and voting on recommendations.	We are getting to the point where there's going to be differences of opinion on the committee on how scoring is applied to individual projects. Let us think about that. I am definitely not opposed to the Long Range Plan Committee coming up with a unified take on things. I think it is also okay to represent different ideas and viewpoints in the plan. Acknowledging that people have different wants out of this process, and so I think it is up to us, as the support team, to try to thread the needle as best as possible in those situations, but not lose sight of our ultimate objectives, and just try to be as fair as we can in the way we apply things and then continue to get your feedback and build general consensus as much as possible.	
324	7/6/2022	William	Patterson	Question	LRP Process	I am curious if there's a standardized template that will be used in scoring each of those concepts to make sure that each concept has the same information all presented? Some of those concepts appear to have gone under, you know, in depth review, and maybe some have not. I just want to make sure that equal representation for each of the criteria and metrics is available for all of those concepts. Have you guys thought about what the write up might look like? And are any of those examples available?	The templates are basically the fact sheets that we've put together for the first seven concepts, but really, we want to get to the level of information that the first four has.	
325	7/6/2022	William	Patterson	Question	LRP Criteria	What I'd be looking for is how each of the metrics were scored, and what information was available to arrive at the score that you get if it's a one in between one and five for water supply risk, what information was presented on that item for each of the concepts, and what the rationale was for providing the score that was given. When I looked at the information template that was available on the website, it doesn't really list out each of the criteria and metrics that need to be evaluated. So I'm curious if that was coming in another step?	Based on comments received, we have updated the criteria and will be presenting the scoring of the concepts and description of the scoring at the next stage of review.	Committee Meeting - Spoken Comment

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
326	7/6/2022	Stephanie	Martin	Comment	LRP Criteria	If we are trying to use the phase 10 year plan as a baseline for the criteria, it should definitely complement, it should match, with the criteria we are using for the Long-Range Plan. In the Phase One: 10 Year-Plan concepts, we are looking for habitat that also has the ability to have dust control benefits. This criteria is not matching.	The Long-Range Plan is aimed at addressing longer-term impacts on a scale of 75 years or a longer timescale. Therefore, additional criteria need to be considered to compare these large-scale alternatives. The 10-Year Plan consists of smaller projects which may not have an impact on the whole Sea or the larger region. Thus, similar but sometimes different criteria are appropriate.	Committee Meeting - Spoken Comment
327	7/6/2022	Art	Gertz	Comment	LRP Criteria	About three years ago, Eduardo Garcia mentioned that the state was interested in completing short term projects that will provide the greatest benefit to residents in West Shores, meaning harvest the low hanging fruit. Well, today, so far all we have in West Shores, is about \$8 to \$12 million spent on hay bales, evidently to create Owens Lake South. Not really a viable solution, the hay bales aren't working, like purported. But the overall picture here is two weeks ago, we were told our state had a budget surplus of \$97.5 billion. And yet, none of this is going to be funneled to solving the big picture of water shortage in the southwest and the restoration of Salton Sea. The state has to want it. And so that's why we've been talking about these problems of Salton Sea for decades. And today, what we have is a Species Conservation Habitat that Imperial Irrigation District says may get water, it may not, it's going to get what it gets. This is for thousands of acres of Species Conservation Habitat is nice. But what is actually being done to help the residents of the Sea basin on what is actually being done, other than lip service. We talk about this, we talk about this, you know, these water import presentations were made available to the public about two years ago. And then we get it dumped on us - oh, wait, we have the fatal flaw. And now we're not getting the allotted time to make corrections to please the whims of the state and this committee. The whole thing is, water is available for West Shores. If you wanted incremental benefits, you go after water that is sitting dormant, and the three hard water wells that Coachella Valley Water District (CVWD) will not release. And Patrick O'Dowd says that would just be too difficult. These are the waters that have been supplying West shores since the late 50s. But CVWD does not want to sell it. They don't consider it worthy. It's their water. And the residents of West shores are not worth it. So that is where we're at. We have solutions available. So far all is being used as \$8 to \$12 million in hay bales. And to the residents of the Salton Sea Basin, this program isn't quite getting it. The 10-Year Plan is way behind on this milestone for dust mitigation. And how are going to get to the big picture when the state doesn't want to turn loose any of its budget surplus? So we're talking about silly things like incremental funding, you're not going to reasonably import sea water from the Sea of Cortez to bring in an adequate supply, sustainable water supply to the southwest, with incremental. You're not going to build part of the solution and try and get more funding.	Comment noted. State projects are typically funded in increments by fiscal year. All other things being equal, we believe there is some merit to consider that if we get incremental funding, there will be incremental benefits.	Committee Meeting - Spoken Comment
328	7/6/2022	Tom	Sephton	Question	LRP Criteria: Efficiency	Earthquake risks - what was sent out to us late last week included something in the earthquake risks that we don't see today. I wonder if it's still there. It said "consideration of induced seismicity due to expansion of geothermal development in the southern part of the Salton Sea." Does that still exist in the earthquake risk criteria? If it does that is quite hypocritical because on the one hand, you're essentially making a policy statement saying that any proposal for Salton Sea restoration that might possibly utilize geothermal energy or stimulate the further development of Geothermal energy is a negative. But at the same time, the state has agreed to an additional 1000 megawatts of geothermal production and is strongly backing lithium development from geothermal brine. So what's the reality with that criterion? Is it still there? And how do you deal with the inherent hypocrisy of it?	We are not going to evaluate geothermal risk to seismicity, and this will not be part of the evaluation. The Earthquake Risk criterion has been reworded to remove the reference to geothermal activity.	Committee Meeting - Spoken Comment

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
329	7/6/2022	Tom	Sephton	Comment	LRP Criteria: Efficiency	The academic literature on the risk of geothermal, and what it may or may not contribute to an additional number of small earthquakes is one not firmly established scientific fact. That was a paper that was released in 2013 on that described it specific to the Salton Sea area, it was a correlation, not a cause and effect found - so that does not qualify as firmed scientific fact that you've got an absolute situation where if you do more geothermal development, you would have more small earthquakes. And the geothermal industry locally definitely disputes that. So, we will have to see how that comes out. And I would say that one, it is actually probably in there as a targeted attack against one proposal that was put forward; and two, if there are going to be targeted attacks in life essentially putting things into criteria specifically to knock out particular proposals, then those who propose them should have the opportunity to revise and work around those issues that have been targeted against them subsequent to the submission of proposals.	We are not going to evaluate geothermal risk to seismicity, and this will not be part of the evaluation. The Earthquake Risk criterion has been reworded to remove the reference to geothermal activity.	Committee Meeting - Spoken Comment
330	7/6/2022	Kerry	Morrison	Question	LRP Criteria	Can those proposals just be updated and revised, and sent in? They're probably going to be mostly the same. But if there's people in this room that have proposals, can they just update that and send it in?	Due to time constraints and the need to make progress, we are planning to follow the process occurring with the Independent Review Panel.	Committee Meeting - Spoken Comment
331	7/6/2022	Tom	Sephton	Comment	LRP Criteria: Efficiency	In this criteria, you have essentially said that working with the geothermal energy opportunity at the Salton Sea is gonna get a major negative hit, because there is a possibility that it might help the geothermal industry expand and that that expansion of the geothermal industry might possibly increase the number of small magnitude one to five earthquakes that happen in the area. That's what the literature talks about. So if that's going to be a negative, we should not be locked into what we put forward on April 2. We should have the opportunity to say "Okay, if we're using geothermal, let's get our geothermal from somewhere else further away, or we should have the opportunity to switch to an alternative, like solar, for example." So it is inappropriate to take in a proposal based on one energy source, and then say, well, we're going to attack you on this energy source, sorry, but you're locked into your April 2 proposal.	We are not going to evaluate geothermal risk to seismicity, and this will not be part of the evaluation. The Earthquake Risk criterion has been reworded to remove the reference to geothermal activity.	Committee Meeting - Spoken Comment
332	7/6/2022	Kerry	Morrison	Comment	LRP Criteria	I am concerned about a few of the things that have happened with the Independent Review Panel in where they've had revolving criteria that knocked out a number of the projects, so that people who put years and tons of time into these projects - quite a few were knocked out based on criteria they didn't know they're being judged on. And multiple incorrect assumptions around hydrology, science, access, topography, and political will. I have spoken to most of those project teams, and there were quite a few false things that knocked out their work.	SSMP supports the approach taken by independent review panel because it allowed for a broad range of potential solutions to be considered.	Committee Meeting - Spoken Comment

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
333	7/6/2022	Kerry	Morrison	Comment	LRP Criteria	It sounds like we're finally realizing that we're running out of water for everything we're talking about in this room, almost. So there's a good chance, some of what the independent review panel is coming up with could benefit these projects as well. So just a proposal that comes from that perspective, to import water is going to be one aspect of it but a lot of that might mesh with all of the projects on the table. There are very few of these that won't do better with a sustainable water source. So I just hope we build in the time to find a way to incorporate those findings in what we're talking about in these proposals as well.	We will incorporate findings from the Independent Review Panel into this report, primarily through evaluating concepts that are deemed feasible.	Committee Meeting - Spoken Comment
334	7/6/2022	Michael	Cohen	Question	LRP Process	I'd be curious to hear from the state team what the schedule is, and when they may be able to share an outline of what the report that is going to be drafted and submitted to the State Water Board. So can we expect to see some kind of outline in the next month? Or the next three months? Or I'm just trying to get a sense, because we're going to start facing some deadlines, and then integrating the Independent Review Panel results.	We take that as an action item to provide a schedule update to the Long Range Plan Committee by the 20th. We will try to center it around the milestones that the Long Range Plan Committee has to get through to plan delivery.	
335	7/6/2022	Michael	Cohen	Question	LRP Process	As part of this schedule update, I'd be very interested in seeing an outline of what that report is going to look like. Because that'll at least for me, be helpful conceptualizing how these different components are going to work together.	We will add that milestone with the description of the outline to that schedule.	
336	7/6/2022	Jasmine	Phillips	Comment	LRP Criteria	In regards to the drought resiliency and the equitable outdoor access when it comes to the projects, I recommend using existing lagoons that are at the Salton Sea, such as the State Park Harbor and the North Shore Yacht Club lagoon. They already have better water quality, and fresh or brackish water inflow. That's already a valuable habitat, and it's already fish living there. This is something that we can incorporate into these long term projects, whether that's North Lake or whatever, there's all this urgency to know projects. And maybe these two little lagoons don't stop any new dust but they're virtually ready to go for habitat projects. There's minimal construction of berms, no new water source because they already have an info, there's no pumping - they just need some tender, loving care to expand that habitat. They may be small acreage wise, but they will have a huge impact for the wildlife for the locals and for the visitors. This area of the Salton Sea is very popular and it can be implemented quickly if the desire is there.	Understood and agree. Currently, the Yacht Club lagoon is expected to be included in the North Lake Demonstration Project.	Committee Meeting - Spoken Comment
337	7/6/2022	Jasmine	Phillips	Comment	LRP Concepts	I have a question in regards to that potential freshwater reservoir that may replace the saline habitat complex. I would like to know is the purpose of that strictly for geothermal, agricultural and industrial usage? Or is it included as part of habitat you anticipate that it will be used by wildlife as habitat? Also, I'm interested to know how large it is and how deep it is. What is the water supply coming from this interim water supply?	We are considering a possible freshwater reservoir within several of our concepts. It would be sourced with Colorado River water and have multiple uses. We are looking at areas that could store about 100,000 AF and have a maximum depth of about 15.	

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
338	7/6/2022	R. Mitchel	Beauchamp	Comment	LRP Concepts	I'm the environmental consultant manager for the Eagle Mountain Railroad, which is now under a new ownership. The railroad is again connecting back up with Union Pacific Railroad which is at the mouth of the Salt Creek. The object is to provide mine products, essentially aggregate, from the overburden from the old Kaiser operation there for any Salton Sea mitigation or, or aggregate use in the region. I'm very concerned about Salt Creek- a population of the pupfish - because the line crosses that and is near it and in some areas. So we're going to be interacting in a positive way I hope with that when we do the rehabilitation of the railroad line. One thing I'm concerned about that's not related to the railroad is the dust supply. When I transit from San Diego to the mine, I'm concerned about the dust source from the Offroad Recreational Vehicle park on the west side. Our guests didn't mention that, but there was apparently an accident on Highway 86 during a dust storm due to that. And so I think State Parks has an issue to play in this. It's not related to seashore exposure, but the use of the land for off road vehicles.	We are planning a regional dust model that would include sources such as this.	
339	7/6/2022	Chris	Cockroft	Comment	LRP Process	I was reading the 10-Year Plan report. And I really think they need to freeze that process until they come up with a Long Range Plan for the entire Salton Sea. I think there's many ways that they dovetail and they should be integrated together.	The processes will converge as we moved toward completion of the Long-Range Plan at the end of this year.	
340	7/6/2022	Stephanie	Martin	Comment	LRP Concepts	I just wanted to remind you that I had a Coachella Valley Basin proposal that is very versatile. And it's still kind of in the limbo land over at the Independent Review Panel. It was designed to be helpful to match various goals, from the short term to the long term, to attract the people back to the area in the region. Let's bring them the win.	Comment noted.	
341	7/6/2022	Felicia	Sirchia	Question	LRP Process	Can you remind us what we're supposed to be commenting on by July 20?	Long Range Plan Committee members should provide feedback on the draft criteria by July 27.	Sarah Friedman
342	7/6/2022	Jenny	Ross	Question	LRP Criteria - Effectiveness	Regarding the dust emissions reduction criterion (Table 1, item 7): Please explain exactly how you will apply this criterion. How will you quantify (a) the dust emissions from exposed lakebed and (b) the surface area of emissive regions of the lakebed for the no-action alternative and for each of the proposed plans?	Criterion has been updated based on numerous comments. Emissions will now be evaluated through three fundamentally different approaches: 1) From simply quantifying exposed lakebed, 2) From modeling emissions coming from solely exposed lakebed, and 3) from modeling emissions from exposed lakebed and regional inputs.	Committee Meeting - Q&A Zoom Chat
343	7/6/2022	Jenny	Ross	Question	LRP Criteria - Acceptability	Regarding the PM10 emissions reduction criterion: Please explain exactly how you will quantify the "ability of [each] restoration concept to reduce the number of days [when] PM10 exceed safe standards"? Also, what is the precise geographic "region" meant here?	Criterion has been updated based on numerous comments. Emissions will now be evaluated through three fundamentally different approaches: 1) From simply quantifying exposed lakebed, 2) From modeling emissions coming from solely exposed lakebed, and 3) from modeling emissions from exposed lakebed and regional inputs.	Committee Meeting - Q&A Zoom Chat
344	7/6/2022	Jenny	Ross	Question	LRP Criteria - Acceptability	Regarding the "baseline," given that the future inflows are unknown, any past calculations related to "baseline" are no longer valid.	For this evaluation, "baseline" refers to a near-term condition where phase 1 projects have been implemented.	Committee Meeting - Q&A Zoom Chat
345	7/6/2022	Jenny	Ross	Question	LRP Criteria - Acceptability	Questions regarding the GHG criterion: Please explain exactly how the SSMP will quantify the CO2-equivalent GHG emissions, including both carbon dioxide and methane, from each component of each proposed long-range plan for the life of the project in order to compare the proposed plans with one another pursuant to the GHG criterion.	Please see responses to detailed comments submitted by Jenny Ross on 7/27.	Committee Meeting - Q&A Zoom Chat

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
346	7/6/2022	Jenny	Ross	Question	LRP Criteria - Acceptability	Why does the GHG criterion not require the proponents of each plan to identify the plan's total annual CO2-equivalent emissions, as well as the quantity of such emissions from each component of the proposed plan, for the life of the restoration project?	Please see responses to detailed comments submitted by Jenny Ross on 7/27.	Committee Meeting - Q&A Zoom Chat
347	7/6/2022	Jenny	Ross	Question	LRP Criteria - Acceptability	Concerning carbon offsets, the GHG criterion states that "concepts should identify the extent of carbon offsetting through nature-based solutions, carbon sequestration, and renewable energies." Why have you used the word "EXTENT" instead of the word 'QUANTITY'? And why is the word "SHOULD" used instead of the word 'MUST'?	Please see responses to detailed comments submitted by Jenny Ross on 7/27.	Committee Meeting - Q&A Zoom Chat
348	7/6/2022	Jenny	Ross	Question	LRP Criteria - Acceptability	The GHG criterion mentions only very general categories of offset types and does not require plan proponents to provide details regarding the specific amounts of GHG emissions to be offset annually for the life of the project using particular identified methods. But many carbon offset methods are speculative, impermanent, ineffective, lack sufficient capacity, and/or fail the additionality test. Will you therefore require that each proposed plan identify each of the following with specificity? (a) Exactly what type of offset method the plan will use for each ton of GHG emissions to be offset annually for the entire life of the restoration project. (b) The specific location of each offset mechanism to be used. (c) The cost per ton of CO2-equivalent emissions to be offset by each type of offset mechanism to be used throughout the life of the restoration project. (d) Exactly how the proponents of the plan have determined the real-world efficacy, capacity, permanence, and additionality of each offset method.	Please see responses to detailed comments submitted by Jenny Ross on 7/27.	Committee Meeting - Q&A Zoom Chat
349	7/6/2022	Jenny	Ross	Question	LRP Criteria - Acceptability	There is no explicit commitment in the GHG criterion or anywhere else in the Draft Evaluation Criteria to select the proposed long-range plan that will have the lowest GHG emissions annually throughout the life of the project. Will the SSMP make such a commitment?	Please see responses to detailed comments submitted by Jenny Ross on 7/27.	Committee Meeting - Q&A Zoom Chat
350	7/6/2022	Jenny	Ross	Question	LRP Process	Please make the draft criteria publicly available in a timely way each time they are updated, so that members of the public have the opportunity to provide comments.	Please see responses to detailed comments submitted by Jenny Ross on 7/27.	Committee Meeting - Q&A
351	7/6/2022	Jenny	Ross	Question	LRP Criteria - Acceptability	This question (5 above) is not technically complex: There is no explicit commitment in the GHG criterion or anywhere else in the Draft Evaluation Criteria to select the proposed long-range plan that will have the lowest GHG emissions annually throughout the life of the project. Will the SSMP make such a commitment?	Please see responses to detailed comments submitted by Jenny Ross on 7/27.	Committee Meeting - Q&A Zoom Chat
352	7/6/2022	Jenny	Ross	Question	LRP Criteria - Acceptability	Will you include the costs for carbon offsets for the life of the project in the analysis to be done for the O&M criterion?	Please see responses to detailed comments submitted by Jenny Ross on 7/27.	Committee Meeting - Q&A Zoom Chat
353	7/6/2022	Jenny	Ross	Question	LRP Criteria - Acceptability	How will you quantify the costs for carbon offsets if the plan proponents are not required to identify exactly what types of offsets will be used and what the amounts of GHGs to be offset by each type of mechanism will be?	Please see responses to detailed comments submitted by Jenny Ross on 7/27.	Committee Meeting - Q&A Zoom Chat

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
354	7/6/2022	Jenny	Ross	Question	LRP Criteria - Efficiency	Regarding the "earthquake risk" criterion, there are numerous significant faults located beneath the lakebed itself, and a number of the plans will build major levees directly on top of them. In addition to problems caused by the shaking associated with an earthquake, there is potentially significant coseismic slip as well as aseismic creep associated with many of those faults. The criterion does not appear to consider these risks, which are very significant.	Please see responses to detailed comments submitted by Jenny Ross on 7/27.	Committee Meeting - Q&A Zoom Chat
355	7/6/2022	Jenny	Ross	Question	LRP Criteria - Efficiency	For example, there is potentially 6 meters of coseismic slip for some of the faults directly beneath the lakebed. That alone would shear some of the major levees proposed in the some of the plans and cause them to fail completely (not even considering the risks of liquefaction).	Please see responses to detailed comments submitted by Jenny Ross on 7/27.	Committee Meeting - Q&A Zoom Chat
356	7/6/2022	Jenny	Ross	Question	LRP Criteria - Efficiency	Please respond to the issues I've raised above regarding seismic risks. Will you amend the criterion to include consideration of the types of risks I've mentioned? The criterion does not currently address them.	Please see responses to detailed comments submitted by Jenny Ross on 7/27.	Committee Meeting - Q&A Zoom Chat
357	7/6/2022	Carl	Nettleton	Question	LRP Process	Will this presentation be available to view later? I have a conflict for the rest of the morning.	Yes, this presentation will be available on the SSMP website after the meeting. We can also email it to panelists.	Committee Meeting - Q&A
358	7/6/2022	Earl	Withycombe	Question	LRP Criteria	Lakebed emissivity varies significantly depending on soil texture and availability of loose sand. Will Imperial Irrigation District's emissivity maps be used to determine the smallest area with least emissivity?	Yes they will be. Thank you!	Committee Meeting - Q&A Zoom Chat
359	7/6/2022	Anonymous Attendee		Question	LRP Process	Is the Long Range Planning Committee also able to address the dust coming from Ocotillo Wells Dust which are around +/- 50% of dust in the region?	This is not a part of the Long Range Plan	Committee Meeting - Q&A
360	7/6/2022	Meenatchi	Odaiyappan	Question	LRP Process	Are Sea-to-Sea plans still being considered and if so, will they be held to the same criteria discussed?	These are being considered by the Independent Review Panel through an independent process.	Committee Meeting - Q&A
361	7/27/2022	Ryan	Sinclair	Comment	LRP Criteria Effectiveness	The restoration concepts could be better evaluated if the process used the "No Action" alternative as a baseline restoration concept instead of the current SSMP. A "No Action" baseline concept would allow the current SSMP 10-year program to be evaluated as a restoration concept along with the other concepts.	The SSMP 10-Year Plan will be scored as the baseline. Other concepts will be compared to show potential benefits above and beyond the 10-Year Plan	Science Committee Review
362	7/27/2022	Ramona	Swenson	Comment	LRP Criteria Effectiveness	Historic period is envisioned as roughly early 2000's (2003 or 2006, looking in past plans/ legislation). It is not the 1950's, centuries scale, nor Lake Cahuilla era.	At this time, the State is targeting conditions that are at least as good as those present in 1999.	Science Committee Review
363	7/27/2022	Tim Bradley and Blake Barbaree		Comment	LRP Criteria Effectiveness	Historic period is envisioned as roughly early 2000's (2003 or 2006, but I need to get more guidance, am looking in past plans/ legislation). It is not the 1950's, centuries scale, nor Lake Cahuilla era.	Agree that diversity of fish and wildlife is the goal. At this stage of the planning process, the metrics available are areas of habitat at different depths and target salinities that would be like those during the greatest diversity of wildlife at the Sea in the past. Therefore, in addition to depth criteria, a salinity criterion has been added as part of the habitat evaluation. Based on Comment 5, a medium depth criterion has been added. Since shallow, medium, and deep-water areas will be measured, there is no longer a need for the total depth criterion. Therefore, the total area criterion has been eliminated.	Science Committee Review

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
364	7/27/2022	Tim Bradley and Blake Barbaree		Comment	LRP Criteria Effectiveness	This criterion is challenging measure accurately and to interpret meaningly in terms of value to biological resources. The shallow-water criterion should include monitoring of migratory bird populations to understand habitat values to the Pacific Americas Flyway. Also, the value of shallow-water habitat to fish and wildlife may vary greatly across the Salton Sea dependent on many factor including its topography, soil type, history of land use, and many more factors.	We have changed the criterion for shallow depth to 0.5 feet deep maximum.	Science Committee Review
365	7/27/2022	Tim Bradley and Blake Barbaree		Comment	LRP Criteria Effectiveness	Similar to other proposed criteria, the ecosystem-level value or the total area of medium depth habitat is challenging to interpret without the inclusion of a biological outcome (in this case likely fish or birds).	A Medium Depth criterion has been added.	Science Committee Review
366	7/27/2022	Tim Bradley and Blake Barbaree		Comment	LRP Criteria Effectiveness	Similar to other proposed criteria, the ecosystem-level value or the total area of medium depth habitat is challenging to interpret without the inclusion of a biological outcome (in this case likely fish or birds).	Agree that diversity of fish and wildlife is the goal. At this stage of the planning process, the metrics available are areas of habitat at different depths and target salinities that would be like those during the greatest diversity of wildlife at the Sea in the past. Therefore, in addition to depth criteria, a salinity criterion has been added as part of the habitat evaluation.	Science Committee Review
367	7/27/2022	Tim Bradley and Blake Barbaree		Comment	LRP Criteria Effectiveness	The total length of shoreline may be highly correlated to the other water-depth criterion, particularly the amount of shallow water. Also, any length of shoreline will have different value to the ecosystem based on its topography, soil type, history of land use, and many more factors.	Agree that shoreline length would be correlated with shallow area. Therefore, this criterion has been eliminated as largely redundant.	Science Committee Review
368	7/27/2022	Tim	Bradley	Comment	Ability to Meet Selenium Standards	Text change was marked up in the document.	Suggested change to metric incorporated.	Science Committee Review
369	7/27/2022	Tim	Bradley	Comment	Long Term Ability to Improve Water Quality	Minimum salinity levels will support brine shrimp. Salinity levels might be the most important factor in determining the complexity of the aquatic ecosystem at the Salton Sea. Current restoration projects already intend to create habitats with lower salinities than the current Salton Sea. Yet and thereby support a broad diversity of wetland-dependent wildlife and plants in danger from rising salinity levels. Biodiversity criteria are needed as indicators of water quality and	Salinity has been added as a criterion under habitat. This criterion has been modified to address other water quality parameters.	Science Committee Review
370	7/27/2022	Tim Bradley and Blake Barbaree		Comment	Long Term Ability to Reduce Dust Emissions from Exposed Lakebed and Protect and Improve Air Quality	To better protect public health, spatial prioritization is needed that considers proximity to key landscapes features including human populations, soil types, and more.	Criterion has been updated based on numerous comments. Emissions will now be evaluated through three fundamentally different approaches: 1) From simply quantifying exposed lakebed, 2) From modeling emissions coming from solely exposed lakebed, and 3) from modeling emissions from exposed lakebed and regional inputs.	Science Committee Review

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
371	7/27/2022	Ryan	Sinclair	Comment	Long Term Ability to Reduce Dust Emissions from Exposed Lakebed and Protect and Improve Air Quality	The restoration concepts could be better evaluated if the process used "No Action" alternative as a baseline restoration concept.	For this second phase plan (Long-Range Plan) we assume the first phase plan (10-year plan) has been implemented.	Science Committee Review
372	7/27/2022	Ryan	Sinclair	Comment	Long Term Ability to Reduce Dust Emissions from Exposed Lakebed and Protect and Improve Air Quality	Not all areas are equally as emissive. Use new data to evaluate how emissive the different soils are and weight these in the score. A smaller land area with a higher emissivity could have the same score as a larger land area with a lower emissivity. These criteria need further definition and can leverage IID and academic studies that evaluate emissivity.	Criterion has been updated based on numerous comments. Emissions will now be evaluated through three fundamentally different approaches: 1) From simply quantifying exposed lakebed, 2) From modeling emissions coming from solely exposed lakebed, and 3) from modeling emissions from exposed lakebed and regional inputs.	Science Committee Review
373	7/27/2022	Ryan	Sinclair	Comment	Protect or Improve Air Quality (Public Health)	This is the only criteria where a public health impact is mentioned as a method to evaluate a restoration concept. Public Health deserves an additional criterion that requires a continuous monitoring of actual human health status in receptor communities. This is best done by maintaining a longitudinal health study across a representative cohort. The longitudinal health study should collect information on respiratory disease indicators and general health indicators over 20 years.	Comment noted and relevant to program implementation, but not specifically related to the criteria being used to evaluate concepts at this planning stage.	Science Committee Review
374	7/27/2022	Ryan	Sinclair	Comment	Protect or Improve Air Quality (Public Health)	These "other contaminants" should be mentioned in this criterion as there are now well-known occurrences of contaminants that can be windblown to sensitive receptor communities. These are the algae blooms and associated toxins near river and canal inflows, the occurrence of organic material in exposed emissive playa, the occurrence of selenium in emissive playa and the presence of legacy pesticides in exposed playa and sediment. A special study should define these "other contaminants" for the purpose of these criteria.	More detail on the specific contaminants that will be modeled will be provided in the description of the air modeling elsewhere in the LRP document.	Science Committee Review
375	7/27/2022	Ryan	Sinclair	Comment	Protect or Improve Air Quality (Public Health)	A GIS proximity analysis should be considered here. It could weigh the air quality improvement with the distance of the project concept to receptor communities. With the exception of Bombay Beach, most shoreline community population centers are on the West and North Shores.	Criterion has been updated based on numerous comments. Emissions will now be evaluated through three fundamentally different approaches: 1) From simply quantifying exposed lakebed, 2) From modeling emissions coming from solely exposed lakebed, and 3) from modeling emissions from exposed lakebed and regional inputs.	Science Committee Review
376	7/25/2022	Michael	Cohen	Comment	General	Please include program goals at the start of the document, to ground the criteria in the context of what we're trying to achieve.	We will incorporate this change.	Committee written comments on Draft Criteria
377	7/25/2022	Michael	Cohen	Comment	General	The criteria should also be applied to some level of "No Action" baseline, for comparison. For the sake of consistency, I suggest using the Army Corps draft EA Alternative 7 "No Action" as the baseline.	Do not agree. It is reasonable that the State would complete Phase 1 before Phase 2.	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
378	7/25/2022	Michael	Cohen	Comment	General	Since the 10-Year Plan has not yet completed the NEPA process, I suggest avoiding any potential issues about "pre-decisional actions." Instead, I suggest that the final criteria be applied to the 10-Year plan as an alternative - perhaps even prior to the next meeting. This would be very informative for the committee and for the public.	Agree.	Committee written comments on Draft Criteria
379	7/25/2022	Michael	Cohen	Comment	General	As I noted in an earlier email, revising and finalizing the water budget will be a critical step toward evaluating any Salton Sea alternative.	Agree. The amount of water available is the limiting factor as to how much habitat can be created. This will be considered in a different section of the report.	Committee written comments on Draft Criteria
380	7/25/2022	Michael	Cohen	Comment	Goals	We've suggested that this goal does not reflect the full breadth of the goals memorialized in statute. In any case, it's important to state the goal up front, to establish the point of this effort. (M. Cohen) Should include language for a long-term goal for a healthy Salton Sea with access to a variety of community amenities targeted at the local communities. (Mariel Loera)	The LRP goal has been added to section 1.1.2, "The Fish and Game Code requires Salton Sea restoration to be based on the preferred alternative, which must achieve the following three objectives: 1. Restoration of long-term stable aquatic and shoreline habitat for the historic levels and diversity of fish and wildlife that depend on the Salton Sea. 2. Elimination of air quality impacts from the restoration projects. 3. Protection of water quality. (FGC sec. 2391 and 2931.5). Section 2940 states what the Legislature hoped to achieve in settings these three objectives for Salton Sea restoration."	Committee written comments on Draft Criteria
381	7/25/2022	Michael	Cohen	Comment	Effectiveness	The objective of building habitat is to re-establish "the historic levels and diversity of fish and wildlife that depend on the Salton Sea." It's a functional objective that should not be reduced to a simple metric of total acreage. This criterion should be replaced with something like "Abundance and diversity of fish and wildlife that depend on the Salton Sea" that estimates these values based on diversity of habitat types	Habitat measures have been updated to reflect input from LRP Committee and the Salton Sea Science Committee.	Committee written comments on Draft Criteria
382	7/25/2022	Michael	Cohen	Comment	Effectiveness	F&GC 2931 does not specify saltwater fish. (Nor is tilapia a "saltwater fish.") Why is supporting "saltwater fish" an objective? Please delete "saltwater" and subsequent salinity targets (already reflected in the selenium criterion)	Habitat measures have been updated to reflect input from LRP Committee and the Salton Sea Science Committee.	Committee written comments on Draft Criteria
383	7/25/2022	Michael	Cohen	Comment	Effectiveness	The diet of wading birds is not limited to fish.	Habitat measures have been updated to reflect input from LRP Committee and the Salton Sea Science Committee.	Committee written comments on Draft Criteria
384	7/25/2022	Michael	Cohen	Comment	Effectiveness	The diet of wading birds is not limited to fish, nor is it clear how the 'length of shoreline habitat that will support' fish can be calculated.	Habitat measures have been updated to reflect input from LRP Committee and the Salton Sea Science Committee.	Committee written comments on Draft Criteria
385	7/25/2022	Michael	Cohen	Comment	Effectiveness	This needs to be linked to the functional objective: "to provide opportunities for beneficial uses and reduce environmental consequences."	Agree with suggested wording.	Committee written comments on Draft Criteria
386	7/25/2022	Michael	Cohen	Comment	Effectiveness	Exposed lakebed emits dust at different rates; evaluating actions and strategies based on least total exposed emissive areas, rather than targeted management on the most emissive areas, substitutes quantity for quality.	Criterion has been updated based on numerous comments. Emissions will now be evaluated through three fundamentally different approaches: 1) From simply quantifying exposed lakebed, 2) From modeling emissions coming from solely exposed lakebed, and 3) from modeling emissions from exposed lakebed and regional inputs.	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
387	7/25/2022	Michael	Cohen	Comment	Effectiveness	Include location as a factor. For example, projects that are closer to communities should score higher,	Criterion has been updated based on numerous comments. Emissions will now be evaluated through three fundamentally different approaches: 1) From simply quantifying exposed lakebed, 2) From modeling emissions coming from solely exposed lakebed, and 3) from modeling emissions from exposed lakebed and regional inputs. This factor will be incorporated into approaches 2 and 3.	Committee written comments on Draft Criteria
388	7/25/2022	M., M.	Cohen, Loera	Question	Effectiveness	How will this be calculated?	Methods for modeling will be discussed elsewhere in the LRP document. Air quality modeling from lakebed to receptor sites is planned.	Committee written comments on Draft Criteria
389	7/25/2022	M., M.	Cohen, Loera	Comment	Acceptability	A project should have NO potential for creating more harm. This should not be a scaled question. If a project can create harm then that potential harm should be addressed and mitigated or the project automatically should not qualify.	The State and LRPC need the opportunity to identify where Environmental Justice concerns exist and if they can be resolved through concept iteration.	Committee written comments on Draft Criteria
390	7/25/2022	R., M.	Zaragoza, Cohen	Question	Acceptability	Does this refer to the potential impacts caused during the construction process?	This level of detail will occur in the next phase at a higher level of design. At this planning stage, we will not identify specific areas of construction activities. These will be identified during CEQA analysis and if, necessary, mitigation measures will be identified.	Committee written comments on Draft Criteria
391	7/25/2022	R., M.	Zaragoza, Cohen	Comment	Acceptability	There might need to be a conversation about what harms are anticipated, if this refers to the construction phase, the longevity of impacts, if its short term and temporary, but agree with Mariela..there needs to be mitigation measures identified no matter how small/or short term the impact may be.	This level of detail will occur in the next phase at a higher level of design. A CEQA analysis will be required for all construction activities and mitigation measures will be implemented.	Committee written comments on Draft Criteria
392	7/25/2022	M., M.	Cohen, Loera	Comment	Acceptability	Instead of "Do No Harm" the criteria should be to what degree the project addresses the environmental burden on communities. Again projects with the potential to create more harm should not be considered.	The State and LRPC needs to have the opportunity to identify where Environmental Justice concerns exist and if they can be resolved through concept iteration.	Committee written comments on Draft Criteria
393	7/25/2022	R., M.	Zaragoza, Cohen	Comment	Acceptability	This can perhaps be attached to the "location" point you made, too, and maybe flipping this to say increased benefits or enhancements to surrounding communities?	Other criteria, including other Acceptability criteria and as an example, the Air Quality criteria, address benefits to the communities.	Committee written comments on Draft Criteria
394	7/25/2022	M., M.	Cohen, Loera	Question	Acceptability	How will the state reach out to the community to better understand what these accessibility needs look like? Or how will they decide what accessibility efforts are sufficient and acceptable to local residents?	With the support of the Regional Community Amenities Working Group the State will create a Community Amenities Strategy Document. This document will also be informed by input received from community members that participate in LRP Workshops and send their input to the Salton Sea contact email (cnra-saltonsea@resources.ca.gov). Community amenities outside the scope of the SSMP, will be cataloged and potential funding may be identified.	Committee written comments on Draft Criteria
395	7/25/2022	M., M.	Cohen, Loera	Question	Acceptability	How will these [GHG] be measured?	GHG Emissions will be evaluated through literature-based estimates for similar systems. This will be described in more detail elsewhere in the LRP document.	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
396	7/25/2022	M., M.	Cohen, Loera	Question	Acceptability	What does offsite carbon sequestration or renewable energies mean/look like?	Refers to carbon sequestration that may be considered outside of the Sea following approaches for similar projects in the State of California. The LRP will not specify the offset. Renewable energy sources are those that avoid or reduce burning of fossil fuels.	Committee written comments on Draft Criteria
397	7/25/2022	M., M.	Cohen, Loera	Comment	Acceptability	Concerns: For the high score that offsets GHG on site my concern is that if the project site includes community amenities and recreational activities then GHG will be concentrated in these outdoor areas.	GHG emissions are not considered a local effect—the effect is global, and there are no direct expected impacts on community amenities or recreational activity.	Committee written comments on Draft Criteria
398	7/25/2022	M., M.	Cohen, Loera	Comment	Acceptability	For the medium score I do not understand what offsite offset means and what this means for GHG levels for communities near by	Having a numeric measure allows us to compare GHG emissions across project concepts. Offsetting emissions offsite refers to the ability to sequester carbon outside of the Salton Basin.	Committee written comments on Draft Criteria
399	7/25/2022	M., M.	Cohen, Loera	Question	Acceptability	What does offsite carbon sequestration or renewable energies mean/look like?	Refers to the ability to sequester carbon outside of the Salton Basin. Renewable energy sources are those that avoid or reduce burning of fossil fuels.	Committee written comments on Draft Criteria
400	7/25/2022	M., M.	Cohen, Loera	Comment	Acceptability	Similar to project accessibility. How will the state determine what project's workforce development fits the best with local needs? The community should be included in this evaluation.	The evaluation will be based on comments on the draft criteria document from LRP Committee, Science Committee and the public, a community workshop on the LRP.	Committee written comments on Draft Criteria
401	7/25/2022	M., M.	Cohen, Loera	Question	Acceptability	Again how will the community or at least CBOs be engaged in this evaluation?	This evaluation will be informed by input received from LRP Committee members and community members that attend LRP Meetings and send their input to the Salton Sea contact email (cnra-saltonsea@resources.ca.gov).	Committee written comments on Draft Criteria
402	7/25/2022	Michael	Cohen	Question	Efficiency	Replacement? Isn't 'maintenance' similar to repair?	Correct, change to "Replacement"	Committee written comments on Draft Criteria
403	7/25/2022	R., M.	Zaragoza, Cohen	Question	Efficiency	would treatment projects fit under this category?	We will apply this criterion to all concepts.	Committee written comments on Draft Criteria
404	7/25/2022	Michael	Cohen	Comment	Efficiency	New wording to allow points for concepts that may not provide 100% performance with lower inflows but still satisfy some of the effectiveness criteria. As written, few if any of the concepts would score for this criterion.	Accept change.	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
405	7/28/2022	Tom	Sephton	Comment	Effectiveness	<p>Description The ability of a restoration concept to reduce the number of days where PM10 levels exceed safe standards in the region</p> <ul style="list-style-type: none"> •Concepts with the lowest number of public health risk days associated with lakebed PM10& other contaminants across selected receptors will be scored a 5, based on modeling •Other concepts will be scaled down, rounded to the nearest integer <p>Comments Emissions from Salton Sea playa are only a portion of PM10 levels in the region. The percentage contribution from Salton Sea playa will depend on windspeed and direction on the playa and measures to control saltation. Ten percent is arbitrary and can be set as the State and LRPC chose. If the scope of projects has to include reduction of PM10 levels from non Salton Sea sources, such as the western desert near Ocotillo Springs, that's a much larger project scope. Also "safe standards" need to be defined.</p>	Criterion has been updated based on numerous comments. Emissions will now be evaluated through three fundamentally different approaches: 1) From simply quantifying exposed lakebed, 2) From modeling emissions coming from solely exposed lakebed, and 3) from modeling emissions from exposed lakebed and regional inputs.	Committee written comments on Draft Criteria
406	7/28/2022	Tom	Sephton	Comment	Effectiveness	<p>Description The extent that a restoration concept improves water quality either in the inflowing waters or within the water bodies or habitat areas within the Salton Sea footprint.</p> <ul style="list-style-type: none"> •Concept with greatest potential to improve water quality scored 5 based on ability to reduce sediments & Total P & N in inflows •Scores for other will scaled by engineering judgment <p>Comments This criterion, as defined by Tetra Tech in the 7/6/2022 meeting only addresses one part of water quality issues, sediment and excess nutrients. There is already a TMDL enforced by the Regional Water Quality Control Board that addresses sediments in agricultural drain inflows to the Sea, and the phosphorus and nitrogen that attach to sediment, so this criterion seems designed to favor projects that provide no new benefit to water quality in the Salton Sea. It totally ignores salinity, oxygenation, pesticides, raw sewage, industrial chemicals, etc. and it gives zero credit for projects that remove these contaminants from the Sea. There is no other water quality criterion proposed to address the other contaminants in the Salton Sea. This would be an egregious oversight.</p>	We have updated this criterion to align with the Basin Plan.	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
407	7/28/2022	Tom	Sephton	Comment	Acceptability	<p>Description Concepts should be evaluated for their contributions to GHG emissions. This evaluation will focus on direct impacts in the areas of construction, operations, maintenance, and landscape changes. Landscape changes should incorporate direct system wide differences from baseline conditions. To the extent feasible, concepts should incorporate measures to minimize GHG emissions. Beyond this feasibility, concepts should identify the extent of carbon offsetting through nature-based solutions, carbon sequestration, and renewable energies. A concept that scores the best would be one where all GHG emissions could be offset onsite through nature-based solutions; this standard incorporates qualitative intrinsic value for having a nature-based solution to a global problem onsite. A concept with a medium score would be one that was able to be offset through offsite carbon sequestration or renewable energies. Finally, concepts that would score the lowest would have GHG emissions that were so high that they could not be feasibly offset</p> <ul style="list-style-type: none"> •Concept will score 5 if GHG emissions can be offset onsite through nature-based solutions •Concepts will score 1 if GHG emissions are so high that they could not be feasibly offset. <p>Comments Project landscapes and waterscapes should be compared by a quantitative estimate of GHG emissions or absorption against a baseline that is the saline Salton Sea of today and the recent past. How this is to be done needs to be defined to the extent possible. No direct measurements of GHG absorption by the Salton Sea or of GHG emissions by playa are currently available and the time to make baseline measurements has by now run out to meet an end of 2022 deadline. Scientific literature does have some basis to provide data using measurements from similar drying lakes. Direct measurement at the Salton Sea could be done after the end of 2022 deadline to verify estimates made from literature values now.</p>	GHG emissions will be evaluated based on the level of detail we currently possess and the best available science, including the literature currently available on carbon cycling in freshwater and saline lakes.	Committee written comments on Draft Criteria
408	7/28/2022	Tom	Sephton	Comment	Efficiency	<p>Description The timeframe for a restoration concept to be completed and commissioned; a shorter timeframe would score higher.</p> <ul style="list-style-type: none"> •Concept with shortest timeframe to achieve objectives will score 5 •One point will be deducted for each additional five years <p>Comments This needs to be compatible with the "Provides Incremental Benefits with Incremental Funding" criterion</p>	Agree with points regarding incremental benefits over time. Our response is to expand the incremental benefits criterion to not be based solely on funding limitations, but to evaluate more broadly how incremental benefits can be realized during the implementation of the full project.	Committee written comments on Draft Criteria
409	7/28/2022	Tom	Sephton	Comment	Efficiency	<p>Description The estimated total annual OMER costs in 2022 dollars for a restoration concept (i.e., the amount needed now to pay for OMER over a 75-year planning horizon).</p> <p>Comments Some projects make take in revenues, including but not limited to recreational use fees, boat launch fees, leases for public lands, mineral recovery, etc. Costs should be estimated as net cost after estimated revenue is taken into account.</p>	Agree. Suggested wording will be considered and may be incorporated as proposed.	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
410	7/28/2022	Tom	Sephton	Comment	Efficiency	<p>Description</p> <p>Whether a restoration concept uses untested technologies or technologies that have a high measure of construction and operational risk; a proven, widely used technology would score higher •Common, low risk, proven technologies used in CA score 5</p> <ul style="list-style-type: none"> •Technologies used elsewhere but not in similar conditions or scale, score 3 •Experimental technologies not proven elsewhere on a large-scale, score 1 <p>Comments</p> <p>Tetra Tech explained in the 7/6/2022 meeting that to score a 5 requires that technologies must have been built at large scale in CA. Since technology crosses State and International borders, there is no logic to the preference for technology used in California except favoritism for the company that drafted this criterion. For desalination technology, the only large scale plant built in CA is the Carlsbad RO desal plant on which Tetra Tech was a design contractor. Tetra Tech is a desalination company among other things. This criterion therefore makes Tetra Tech and their design partners on the Carlsbad plant the only team that can meet this criterion with a score of 5. This is Tetra Tech using their position as writer of the rules on which these projects are scored to set Tetra Tech and associates up to be a sole source design contractor team favored to get any Salton Sea desalination job. After three LRP Committee members complained, James Newcomb agreed to modify the wording to say "Common, low risk, proven technologies approved in CA score 5". That means the same thing because the only desalination technology approved at scale in CA is the one plant at Carlsbad that went through the six year approval process. Desalination technology used on the coast has NOT been used in a similar condition to the hyper-saline Salton Sea with high biological content and a mix of ions very different from the ocean. The SWRO technology used in the Tetra Tech and associates design for the Carlsbad plant should score a 3 absent the preference granted to Tetra Tech for technology put to use on the California coast.</p> <p>Additionally, it should be noted that current State projects like SCH are using a habitat salinity and contaminant management technology, blending of hyper-saline Salton Sea water with brackish agricultural drain water that at times has selenium, chlopyrifos, and fecal coliform loads in excess of EPA standards, that has only been tested on the very small scale of a few acres at the Alamo River a decade ago. Some elevated selenium levels were recorded. SCH would not get a high score on this criteria as currently described if it were subjected to the same evaluation.</p>	<p>Partially agree. However, all components that are necessary for operational success should be evaluated. The component with the lowest score should be represented for this criterion. Relative or proportional scores overlook the possibility of a fatal flaw for some components.</p>	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
411	7/28/2022	Tom	Sephton	Comment	Efficiency	<p>Description</p> <p>The potential seismic exposure of elements of a restoration concept, such as earthworks and other engineered elements. Also, consideration of induced seismicity due to expansion of geothermal development in the southern part of the Salton Sea. Time and cost to restore functionality will be considered for this criterion.</p> <ul style="list-style-type: none"> •All concepts designed for earthquakes •Concept with lowest combination of embankment structure height/head differential & water retention volume score 5 •Others scored proportionally <p>Comments</p> <p>"Also, consideration of induced seismicity due to expansion of geothermal development in the southern part of the Salton Sea." Whether or not geothermal development on the southern part of the Salton Sea induces seismicity is a matter of current scientific controversy, not proven fact. For example the Brodsky, Lajoie 2013 paper finds a correlation to net fluid extraction, not definitive cause and effect. It should be noted that geothermal projects on the south end of the Salton Sea do NOT use the enhanced geothermal technology, which is similar to fracking and has shown more definitive cause and effect. Further geothermal development will succeed or fail near the Salton Sea based on the economics of renewable energy, lithium, and other minerals, not on a criterion set by SSMP. This criterion component is, in part, a hypocritical policy statement opposing the use of geothermal energy for restoration of the Slton Sea, while at the same time the State is supporting geothermal lithium development and an additional 1,000 MW of new geothermal power for coastal cities. At its core, this criterion component is a targeted attack on one proposal put on the table, not a legitimate evaluation of earthquake risk posed by projects generally.</p>	Agree. Consideration of geothermal effects on seismicity is more appropriate at the next phase of more detailed evaluation.	Committee written comments on Draft Criteria
412	7/27/2022	Jasmyn	Phillips	Request	Effectiveness	<p>Water quality:</p> <p>In addition to managing salinity, selenium, sediments and nutrients, please add dissolved oxygen, sewage spills and pesticides since certain habitat projects would use highly contaminated river water.</p>	We have updated this criterion to align with the Regional Board Basin Plan.	Committee written comments on Draft Criteria
413	7/27/2022	Jasmyn	Phillips	Request	Acceptability	<p>Drought Resiliency, Wildlife, Equitable Outdoor Access, Environmental Justice Communities and Total Habitat Area:</p> <p>Ensuring the piscivorous (fish-eating) birds have a sustainable food source and deep water habitat must be a priority at the Salton Sea.</p> <p>Please include The Pelican Oasis Salton Sea Restoration Concept submitted April 1, 2022 (attached) as part of the habitat restoration concepts.</p> <p>In order to protect the birds, fish, the Pacific Flyway and the beneficial uses of the Salton Sea, it is vital to utilize the wet shoreline harbors that already exist at the State Park and North Shore Yacht Club. These ponds have a sustainable year round inflow and outflow of fresh or brackish water. The total acreage may be small but the impact on saving wildlife, boosting tourism, recreation and economic benefits would be significant. The minimal construction workload and size of the project in the existing lagoons with a water source make it quicker to implement.</p>	We agree with the importance of ensuring the piscivorous (fish-eating) birds have a sustainable food source and deep-water habitat. The Pelican Oasis Salton Sea Restoration Concept has been received and is being evaluated.	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
414	7/27/2022	Jasmyn	Phillips	Request	Acceptability	Geothermal Desal, Drought Resiliency and Work Force Development: I strongly urge the LRPC and SSMP to choose and implement the Water Recycling Concept (VTE-MED technology) to desalinate Salton Sea water for habitat restoration. Sephton Water Technology is local and on the ground for over 15 years, proving their technology is best suited for the Salton Sea.	This concept will be evaluated.	Committee written comments on Draft Criteria
415	7/27/2022	Jenny	Ross	Comment	General	<p>A. Definition of the Term “Baseline Conditions” The concept of “baseline conditions” is implicit in many portions of the Draft Criteria document, and it is explicit in the draft evaluation criterion relating to greenhouse gas emissions. However, no definition of “baseline conditions” applicable to all of the Draft Criteria is provided in the Draft Criteria document.</p> <p>An explicit, detailed, and unambiguous definition of the term “baseline conditions” must be formulated by the SSMP and provided for use with the criteria that will be applied when evaluating proposed long-range plans. The definition should be presented in a Definitions section of the document that sets forth the evaluation criteria.</p> <p>The only criterion in the Draft Criteria document that identifies the nature of “baseline conditions” is the criterion in the “Effectiveness” category that relates to reduction of dust emissions. The description of that criterion specifies that a proposed plan’s ability to reduce dust emissions should be judged in relation to “no action” conditions. However, the details of this “no action” baseline are not explained. [7] Moreover, the use of “no action” as the baseline is not explicitly extended to any other criteria in the Draft Criteria document.</p> <p>In contrast, the SSMP document entitled “Preliminary Restoration Concepts” states that “baseline” conditions are those that will result from completion of all habitat and dust control features of the California Natural Resources Agency’s Phase 1: 10-Year Plan as presented in the “Updated Draft Salton Sea Management Program Phase 1: 10-Year Plan Project Description” published in March 2021 (the “10-Year Plan”). [8]</p> <p>During the July 6, 2022 LRPC meeting, there was a brief discussion that appeared to confirm that the SSMP has decided the “baseline” for purposes of evaluating proposed long-range plans pursuant to the Draft Criteria will be the completed 10-Year Plan. However, again, the Draft Criteria document does not make this clear.</p> <p>To define “baseline conditions” as those resulting from completion of the 10-Year Plan would be unreasonable, and application of such a “baseline” concept to evaluate proposed long-range restoration plans would be entirely unworkable.</p>	<p>We will provide more detail on the term “baseline condition” in the introductory sections of the report. In general, it means the condition once a suite of Phase 1 projects are implemented, satisfying SWRCB order 2017-0134.</p> <p>While uncertainty in implementing Phase 1 projects exists, we believe it is a more certain outcome than not implementing Phase 1 projects. This level of certainty is acceptable for evaluating concepts at this stage of high-level of planning.</p>	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
						<p>1.The precise components of the 10-Year Plan are extremely uncertain. After many years of planning activities, the 10-Year Plan is still in draft form at this late date. Moreover, even if some version of the 10-Year Plan is in fact eventually implemented, it is currently unclear what the implemented features of the plan may turn out to be. In fact, the June 2022 Draft Environmental Assessment for the SSMP 10-Year Plan explicitly recognizes the existence of uncertainty regarding the plan's features, and presents various "alternatives" for the proposed elements of the 10-Year Plan.</p> <p>2.Because the features of the 10-Year Plan are uncertain, the conditions that may result from the plan's implementation are necessarily unknown. It simply makes no sense to consider those unknown conditions as the "baseline" for evaluating proposed long-range plans.</p> <p>3.There is no guarantee that any version of the 10-Year Plan will ever be completed. For example, there may be insufficient inflow to the central Salton Basin to support the features of the plan. Moreover, the 10-Year Plan process has been delayed for so long that expediting implementation of whichever long range plan is selected may make more sense than proceeding to expend more resources and time on the 10-Year Plan.</p> <p>I suggest that the only appropriate "baseline" to use for purposes of evaluating proposed long-range plans (to the undetermined extent that some facets of that evaluation may require the use of a "baseline") is a hypothetical no-action scenario in which literally no measures at all are implemented to address any of the Salton Sea's problems. Even to include the Species Conservation Habitat (SCH) project and current dust mitigation measures as part of the no-action scenario would be inappropriate in light of the fact that the SSMP must select a long-range plan by December 2022, and the effects of SCH implementation and current dust mitigation measures on various conditions at the Salton Sea cannot be properly and fully assessed and incorporated into an evaluation of proposed long-range plans before that deadline.</p> <p>[7] Relevant to this issue is the fact that the SSMP's hydrological modeling assumes the "no action" scenario utilized for purposes of the modeling will include, for example, a variety of major, extensive dust-suppression measures implemented across 75% of exposed lakebed. No justification for making this significant assumption is provided, and it appears to be unwarranted. Moreover, the presumption that such measures will actually be effective in eliminating fugitive dust from 75% of the lakebed is unsupported.</p> <p>[8] Available online at: https://saltonsea.ca.gov/wp-content/uploads/2021/03/Updated-Draft-Salton-Sea-Management-Program-Phase-I-10-Year-Plan-Project-Description-March-2021.pdf</p>		

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
416	7/27/2022	Jenny	Ross	Comment	General	<p>B. Definition of the Term “Habitat”</p> <p>The term “habitat” is used in many of the Draft Criteria, but is undefined. Therefore, it is unclear what proposed project features would qualify as “habitat” or how proposed project features should be compared with one another in assessing the effectiveness of “habitat” in achieving the goals of the Salton Sea Restoration Act. [9]</p> <p>A definition of the term “habitat” must be formulated by the SSMP and included in either:</p> <p>(a) a Definitions section of the document that sets forth the evaluation criteria, if the intended meaning of the term “habitat” does not differ from one criterion to another; or (b) each criterion that uses the term, if the intended meaning of the term “habitat” does differ from one criterion to another.</p> <p>The definition of “habitat” should be formulated in a manner that ensures proposed impoundments that are designed and intended to be used primarily for recreation or as freshwater reservoirs are not categorized as “habitat” simply because they contain water.</p> <p>[9] California Fish & Game Code, Division 3, Chapter 13, Sections 2930-2945, as amended.</p>	Habitat measures have been updated to reflect input from LRP Committee and the Salton Sea Science Committee. We have provided a more specific definition in the criteria document and will provide more background in as other introductory sections of the LRP document are drafted.	Committee written comments on Draft Criteria
417	7/27/2022	Jenny	Ross	Request	General	<p>C. Use of the Term “Restoration Concept” and Similar Terms</p> <p>The terms “concept,” “restoration concept,” “concept or strategy,” and “actions or strategies” are used in a number of places in the Draft Criteria document, apparently to refer to the proposed long-range plans that the Draft Criteria will evaluate. But evaluation criteria for long-range plans cannot be applied in order to evaluate a vague “concept” or “strategy”; they can only be applied to evaluate an actual plan that contains clear details concerning all features of the project proposed to be implemented for long-term restoration of the Salton Sea. The phrase “proposed restoration plan” (or “proposed plan”) should be used instead of “concept,” “restoration concept,” “concept or strategy,” and “actions or strategies.”</p>	We will provide more specific definitions as other introductory sections of the document are drafted. Ultimately, numerous variations of “concepts” will be evaluated. Each concept variation will include one or more relevant “strategies.” The term “action” was used instead of “concept” early on, but it is not a term we feel was embraced by stakeholders, so we intend to eliminate it from our verbiage.	Committee written comments on Draft Criteria
418	7/27/2022	Jenny	Ross	Comment	General	<p>D. Weight of Evaluation Criteria</p> <p>It appears that the SSMP intends for all of the evaluation criteria set forth on the Draft Criteria document in Tables 1-4 to be weighted equally when applying them to assess proposed long-range restoration plans. But equal weighting of the criteria would be misguided. All criteria are clearly not equally important. For example, while the “Workforce Development” criterion expresses a worthy goal, it is obviously not as crucial as minimizing dust emissions to protect public health.</p>	Weighting is not necessary at this stage to quantify relative benefits, risks, and costs of each concept. However, we can consider weighting at a later date.	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
						<p>I urge the SSMP to weight most heavily the criteria that are directed at particular objectives of the Salton Sea Restoration Act and that address the protection of human health and the survival of wildlife, including the greenhouse gas emissions criterion. [10] Because the aim of the greenhouse gas emissions criterion (hereinafter the “GHG criterion”) is to mitigate climate change – which is an urgent threat that will become an existential crisis for both wildlife and people in numerous regions of the world during the 21st century if it is not greatly mitigated – that criterion should be included as a high priority, heavily-weighted criterion related to human health and wildlife survival.</p> <p>[10] The “greenhouse gas criterion” is the item in Table 2 of the Draft Criteria document entitled “Minimize greenhouse gas (GHG) emissions.”</p>		
419	7/27/2022	Jenny	Ross	Comment	Acceptability	<p>1. Draft Criterion “Minimize Greenhouse Gas (GHG) Emissions”</p> <p>Although my subsequent comments will address other Draft Criteria in the order in which they are presented in the Draft Criteria document, I am discussing the draft GHG criterion first, out of order, because of the great importance of the subject and the serious, fundamental flaws in the formulation of the criterion presented in the Draft Criteria document. As I explained to the LRPC and SSMP six months ago, implementation of a proposed in-basin Salton Sea restoration plan is likely to result in the release of major quantities of greenhouse gas emissions on an ongoing basis for the foreseeable future from the features of such plans. [11] It is essential for the SSMP to properly assess this issue using a suitable evaluation criterion and an appropriate methodology.</p> <p>Draft Criterion Description:</p> <p>“Concepts should be evaluated for their contributions to GHG emissions. This evaluation will focus on direct impacts in the areas of construction, operations, maintenance, and landscape changes. Landscape changes should incorporate direct system wide differences from baseline conditions.”</p> <p>“To the extent feasible, concepts should incorporate measures to minimize GHG emissions. Beyond this feasibility, concepts should identify the extent of carbon offsetting through nature-based solutions, carbon sequestration, and renewable energies. A concept that scores the best would be one where all GHG emissions could be offset onsite through nature-based solutions; this standard incorporates qualitative intrinsic value for having a nature-based solution to a global problem onsite. A concept with a medium score would be one that was able to be offset through offsite carbon sequestration or renewable energies. Finally, concepts that would score the lowest would have GHG emissions that were so high that they could not be feasibly offset.”</p>	<p>Effectiveness criteria measure how well a restoration concept accomplishes an individual objective from the suite of core Salton Sea LRP objectives: 1) Protect or improve air quality to reduce public health consequences 2) Protect or improve water quality to provide opportunities for beneficial uses and reduce environmental consequences 3) Restoration of long-term stable aquatic and shoreline habitat for the historic levels and diversity of fish and wildlife that depend on the Salton Sea.</p> <p>GHG is an important factor that will determine the acceptability of a concept, but it is not directly tied to a core objective.</p>	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
						<p>1. Inappropriate Placement of the GHG Criterion in the “Acceptability” Category</p> <p>The Draft Criteria document places the GHG criterion in Table 2, within the “Acceptability” category. This is inappropriate. All of the Draft Criteria within the “Acceptability” category other than the draft GHG criterion concern tribal issues and matters relevant to equity and environmental justice. The GHG criterion does not belong in the same category as those subjects. Instead, the GHG criterion properly belongs in the “Effectiveness” category, because that set of criteria (set forth in Table 1) focuses on the extent to which a proposed long-range restoration plan accomplishes the objectives set forth in the Salton Sea Restoration Act.</p> <p>The emission of greenhouse gases is an air quality issue. The GHG criterion addresses air quality problems related to greenhouse gases emitted because of the shrinkage of the Salton Sea and the collapse of its ecosystem, as well as because of the particular features in proposed restoration plans, and the ways in which the projects set forth in proposed plans will be constructed, operated, and maintained.</p> <p>The legislative objectives for Salton Sea restoration that should guide the long-range planning process and the selection of a long-range plan for implementation are set forth in Sections 2931 and 2940 of the Salton Sea Restoration Act, in California Fish and Game Code Division 3, Chapter 13, as amended. Because the GHG criterion concerns the improvement of air quality through the minimization of greenhouse gas emissions, the specific legislative objectives that are relevant to the GHG criterion are Section 2931(c)(2), Section 2940(f)(3), and Section 2940(f)(7). Those sections focus on the need to eliminate, minimize, or mitigate: (a) impacts on air quality from restoration projects, and (b) other air quality problems.</p> <p>The GHG criterion clearly targets the extent to which a proposed long-range plan accomplishes an objective set forth in the Salton Sea Restoration Act, and it therefore should be presented in the “Effectiveness” category of evaluation criteria.</p> <p>Another reason to include the GHG criterion in the “Effectiveness” category is that, as explained in the description of that category, “Climate resiliency is a foundational element in the analysis of each of the effectiveness measures...” (Draft Criteria document, page 2). No factor will have a greater and more fundamental negative impact on climate resiliency than the failure to minimize greenhouse gas emissions.</p>		

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						[11] Ross, J.E. (2022). Potential Major Greenhouse Gas Emissions from Proposed Salton Sea Long-Range Plans. Report submitted to the Salton Sea Long-Range Planning Committee of the Salton Sea Management Program, California Natural Resources Agency. January 27, 2022. 14 pp. (Appended as Attachment 2, and available online at: https://www.researchgate.net/publication/360029978_Potential_Major_Greenhouse_Gas_Emissions_From_Proposed_Salton_Sea_Long-Range_Plans .) Also see the Supplementary Information for that peer-reviewed report, explaining the possible magnitude of the greenhouse gas emissions that may result from implementation of proposed long-range plans for the Salton Sea that leave vast areas of lakebed exposed, and that include other components that are potentially large sources of carbon emissions. (Available online at: https://www.researchgate.net/publication/360030144_SUPPLEMENTARY_INFORMATION_for_the_Report_Potential_Major_Greenhouse_Gas_Emissions_From_Proposed_Salton_Sea_Long-Range_Plans .)		
420	7/27/2022	Jenny	Ross	Comment	Acceptability	<p>2. Unclear Terms and Inappropriate Concepts in the Draft GHG Criterion</p> <p>(a) "...contributions to..." (paragraph 1) It is unclear why this phrase is included. It appears to be superfluous – i.e., it adds no distinct meaning to the sentence that the sentence would not have without it. If the phrase is indeed superfluous, its presence in the sentence creates confusion and it should be deleted. On the other hand, if the phrase is intended to distinguish between GHG emissions from a proposed plan versus GHG emissions from baseline conditions, then I suggest that is problematic; see the pertinent comments in section VII.A.3 below. Therefore, I suggest the sentence should be revised to state: "The GHG emissions from or related to the features of a proposed restoration plan shall be evaluated."</p> <p>(b) "...direct impacts..." (paragraph 1) The intended meaning of this phrase is unclear. It should be explicitly and clearly defined within the GHG criterion description or in a separate Definitions section at the beginning of the document that presents all the evaluation criteria. It appears that the phrase "direct impacts" may be intended to distinguish between: (1) GHG emissions related to offsite processes such as the manufacture of the raw materials and equipment used in constructing a restoration project, which it seems are to be considered "indirect" emissions; and (2) GHG emissions related to a project's on-site features and resulting from the construction, operation, and maintenance of the project – all of which GHG emissions are, it seems, to be considered "direct" emissions. If that is the purpose for using the phrase "direct impacts," that intended meaning should be stated explicitly and clearly.</p>	For this higher-level planning phase, we are evaluating the relative differences in the level of GHG emissions across concepts. Any potential required mitigation measures would be identified during a more formal CEQA review.	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
						<p>(c) "...landscape changes." (paragraph 1)</p> <p>(1) If this phrase is to be used (and I suggest below that it shouldn't be), it must be explicitly and clearly defined within the GHG criterion description or in a separate Definitions section at the beginning of the document that presents all the evaluation criteria. (Although the subsequent sentence may have been intended to clarify the meaning of this phrase, it does not accomplish that goal. See the related comments in section VII.A.3 below.)</p> <p>(2) I suggest that for clarity and precision the phrase "landscape elements and landscape-altering features" should be used instead of "landscape changes." The term "landscape elements" would refer to components of the future landscape in the original Salton Sea footprint that will result from implementation of a proposed long-range plan but will not be created by direct man-made modifications of the landscape. Examples of such landscape elements are areas of lakebed that are exposed pursuant to a proposed plan's design, and a brine sink in the central Salton Basin that is part of a proposed plan's design. The term "landscape-altering features" would refer to constructed or otherwise man-made landscape components of a proposed long-range plan (as distinguished from man-made facilities or structures such as a pumping station or a power plant). Examples of landscape-altering features are canals, levees, and impounded lakes. The term "landscape-altering features" would also refer to direct modifications of landscape elements, such as surface roughening or intentional dampening of exposed lakebed.</p> <p>(d) "...Beyond this feasibility, concepts should identify the extent of carbon offsetting through nature-based solutions, carbon sequestration, and renewable energies." (paragraph 2)</p> <p>The opening phrase of this sentence is awkward and unclear, and the rest of the sentence is problematic in various ways. The phrase "nature-based solutions" is insufficiently specific. Such "solutions" should be considered subsumed within the offsite offset category "carbon sequestration." On-site "nature-based solutions" should not be allowed as carbon offsets, as explained in section VII.A.4(e) below. The use of "renewable energies" as offsets should also not be allowed, as explained in section VII.A.4(d) below.</p>		
421	7/27/2022	Jenny	Ross	Comment	Acceptability	<p>3. The sentence "Landscape changes should incorporate direct system wide differences from baseline conditions." (Hereinafter "this sentence" or "the above sentence.")</p> <p>(a) There are multiple problems with this sentence that render its wording and overall meaning so unclear and ambiguous that it is essentially unintelligible. In particular:</p> <p>(1) This sentence does not use proper English grammar or sentence structure.</p> <p>(2) The meaning of each of the following words and phrases is undefined and unclear in the context in which it is being used: "landscape changes," "should incorporate," "direct," "system wide," "system wide differences," "baseline conditions."</p>	Criterion language has been revised for clarity.	Committee written comments on Draft Criteria

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						<p>(3) In particular, it is unclear whether “baseline conditions” are intended to include components of the future landscape in the original Salton Sea footprint that will result from implementation of a proposed long-range plan but will not be created by direct man-made modifications of the landscape, such as areas of exposed lakebed and a brine sink in the central Salton Basin, or whether such landscape elements would be considered “landscape changes.” However, because such components of the future landscape (for which I suggest the term “landscape elements” in section VII.A.2(c) above) will result from the design of a particular proposed plan, they should not be treated as part of “baseline conditions.”</p> <p>Speculation should never be necessary regarding the overall meaning and intent of an evaluation criterion or the meaning of individual words or phrases in the description of the various aspects of a criterion. Therefore, the above sentence should be completely rewritten, and every word and concept used in the revised sentence (or sentences) should be explicitly and clearly defined if it is not self-explanatory (i.e., if the meaning is not the normal, everyday English meaning of a commonly used word or phrase).</p> <p>(b) If one speculates and strains to understand – which, again, should never be necessary – it seems that perhaps the intent of this sentence is:</p> <ul style="list-style-type: none"> • to limit the accounting of GHG emissions associated with the features of each proposed plan to only the GHG emissions associated with plan features that require direct man-made alterations of the landscape within the Salton Sea ecosystem [12] in order to implement the design of the plan and to construct, operate, and maintain all aspects of the project set forth in the plan (these are “landscape-altering features” as I’ve defined them above); and • to eliminate from the accounting of a plan’s GHG emissions any GHG emissions being discharged from any feature of the landscape within the Salton Sea ecosystem that is deemed to be part of “baseline conditions” (which are undefined in the Draft Criteria document but need to be explicitly and clearly defined as discussed in section VI.A. above). 		

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						<p>I don't know whether the above interpretation of the meaning of this sentence accurately reflects the intended meaning, and there seems to be no way to find out. However, assuming the above interpretation is correct: When one considers this sentence in the context of the rest of the first paragraph of the GHG criterion description as a whole, it becomes apparent that the SSMP has chosen a fundamentally misguided and utterly unworkable approach for evaluating GHG emissions from proposed long-range plans.</p> <p>Use of such an approach would require unquantified (and likely unquantifiable) GHG emissions that will be discharged by numerous undetermined and mutable GHG emission sources in "baseline conditions" to be numerically compared with other unquantified (and likely unquantifiable) GHG emissions that will be discharged by other undetermined and mutable GHG emission sources resulting from implementation of a proposed plan, in order to draw conclusions about the specific quantity of GHG emissions to be attributed to the "landscape changes" of a proposed plan. This would be an impossible endeavor.</p> <p>The targets of the evaluation to be done using the GHG criterion are not readily quantifiable GHG emissions of known types being discharged at a relatively constant rate from specific, well-understood, man-made point sources. Rather, what is at issue – concerning both "baseline conditions" and the landscape-related conditions that will result from implementation of a proposed plan – are numerous, varied, constantly changing biological and biogeochemical processes, the nature and extent of which cannot be fully determined (or possibly even fully understood) in advance, and that will be emitting unknown types of GHGs in amounts that cannot be quantified with precision because of all the potential variables and uncertainties involved.</p> <p>The specific types and quantities of GHG emissions that would come from "baseline conditions" during the next 75 years cannot be accurately determined. In addition, the specific details of the future GHG-emitting biological and biogeochemical processes within the landscape elements (such as areas of exposed lakebed and brine sinks) and landscape-altering features (such as canals and impoundments) of proposed long-range plans are uncertain, and they will vary over time; therefore, the types and quantities of GHGs to be emitted as a result of those processes over the lifetime of a particular proposed restoration project are also uncertain and cannot be precisely quantified.</p>		

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						<p>Thus, again, it is impossible to perform the accounting of a proposed plan's landscape- related GHG emissions that is required by this part of the draft GHG criterion.</p> <p>[12] Section 2931(d) of the Salton Sea Restoration Act defines the phrase "the Salton Sea ecosystem." It states, "For the purpose of the restoration plan, the Salton Sea ecosystem shall include, but is not limited to, the Salton Sea, the agricultural lands surrounding the Salton Sea, and the tributaries and drains within the Imperial and Coachella Valleys that deliver water to the Salton Sea." (California Fish & Game Code Section 2931(d).)</p>		
422	7/27/2022	Jenny	Ross	Comment	Acceptability	<p>4. Use of Carbon Offsets</p> <p>(a) Problems with Carbon Offset Schemes: Overpromising and Under-delivering</p> <p>Carbon offset schemes have a long track record of overpromising and under-delivering real, meaningful reductions in carbon emissions. There are many inherent challenges and potential problems involved in the design and administration of carbon offset projects that are well known. For example: It is extremely complicated and difficult to determine the quantity of GHG emissions actually being sequestered or avoided by carbon offset projects, and often accurate numbers are elusive. In addition, there are vexing difficulties related to the requirement of "additionality" that must be met by offset projects; there are significant challenges concerning the need to prove avoidance of "double-counting" and "leakage"; and the requirement of "permanence" is very troublesome and increasingly difficult to satisfy given the worsening effects of climate change (for example, forests used as offset mechanisms are releasing their stored carbon to the atmosphere as they burn in warming-driven wildfires and as they succumb to worsening droughts and insect infestations). There are numerous examples of poorly designed offset projects that fail to deliver the promised sequestration amounts, and there are also documented instances of problematic gaming of the offset system and even fraud. As a consequence of the many difficulties involved, some offset schemes may result in increased net carbon emissions rather than reductions.</p>	<p>Metric has been revised to incorporate a relative score for GHG emissions. To achieve a score of 5, concepts must offset or eliminate GHG emissions through nature-based solutions onsite. A concept that can be offset through offsite carbon sequestration or renewable energies would be given a score of 4 through 2 based on a relative comparison of emissions. Finally, concepts that would produce GHG emissions that were so high that they could not be feasibly offset would receive a score of 1.</p> <p>GHG emissions will be evaluated based on the level of detail we currently possess and the best available science</p>	Committee written comments on Draft Criteria

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						<p>In addition, to allow the use of carbon offsets to counteract GHG emissions creates a moral hazard for the emitter. It will always be easier simply to purchase carbon offsets than to prevent GHG emissions from occurring in the first place; and as long as carbon offsets remain relatively inexpensive, it will also typically be less costly to purchase them instead of avoiding GHG emissions by eliminating or modifying emitting activities, facilities, or equipment. Therefore, allowing the use of carbon offsets can serve to disincentivize making GHG emission reductions, and in some circumstances may actually incentivize increasing GHG emissions.</p> <p>Moreover, in the specific case of GHG emissions from the projects to be implemented pursuant to proposed long-range Salton Sea restoration plans, allowing the use of carbon offsets may create a moral hazard for the SSMP itself. Even if there is a proposed plan that can actually minimize or eliminate most or all GHG emissions without relying on carbon offsets, the SSMP will be incentivized to select a less expensive plan that takes less time to implement even if it will yield high GHG emissions, because the SSMP will assume that carbon offsets will counteract (in theory if not in reality) those high GHG emissions.</p> <p>Even if it is assumed that a carbon offset mechanism can actually sequester the quantity of greenhouse gases being emitted by the purchaser of the offsets (a dubious assumption), to sequester carbon after it is emitted is not equivalent to avoiding its emission in the first place. GHG emissions can affect the climate as soon as they enter the atmosphere, and subsequent carbon sequestration may not actually negate the climate effects of the carbon already emitted, particularly when emissions are rapid and the sequestration mechanism involved entails a slow process. In fact, as climate change worsens and a variety of climate feedback effects are initiated, it will become increasingly likely that at least some climate impacts of emitted GHGs cannot be counteracted by later sequestration.</p> <p>For all the above reasons, carbon offsets should not be relied upon when GHG-emitting sources and activities can be eliminated or modified to accomplish direct GHG emission reductions. Successfully addressing climate change requires actually reducing GHG emissions, not simply appearing to do so.</p>		

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						<p>(b) Limited Permissible Reliance on Offsite Carbon Sequestration Offsets It may be appropriate in specific, limited circumstances for proposed long-range restoration plans to rely on validated offsite carbon offset mechanisms that utilize carbon sequestration and satisfy other requirements, in order to compensate for a particular subset of GHG emissions from a proposed plan.</p> <p>(1) Category of GHG Emissions for which Carbon Offsets May be Used It would be reasonable to allow carbon offsets to be used for the subset of a proposed plan's GHG emissions that are:</p> <ul style="list-style-type: none"> • infeasible to eliminate; • come from specific known sources; • are quantifiable; and • are related to identified project tasks that are part of construction, operation, and maintenance activities that must occur, must be done in a particular way, and must rely on the burning of fossil fuels. <p>(2) Requirements for Relying on Offsets If proposed restoration plans will be allowed to use carbon offsets for the limited purpose described above, the proponents of each plan desiring to rely on carbon offsets should be required – prior to SSMP's assessment of the plan using the evaluation criteria – to do all of the following:</p> <ul style="list-style-type: none"> • identify the particular validated carbon offset mechanism to be used; • identify the specific GHG-emitting activities and sources involved, and the amounts of CO₂-equivalent GHG emissions to be offset; • demonstrate that the chosen offset mechanism will satisfy the following requirements: <ul style="list-style-type: none"> o effectiveness (i.e., it will actually sequester the quantity of CO₂-equivalent (CO₂-e) that matches the GHG emissions intended to be offset); o additionality (i.e., the carbon sequestration project involved would not otherwise exist if it were not being used as a paid offset mechanism); o permanence (i.e., the sequestered carbon will be removed from the atmosphere permanently, will not be re-emitted intentionally, accidentally, or naturally in the foreseeable future); o avoidance of double-counting (i.e., each ton of CO₂-e sequestered by the offsetting mechanism and used as an offset will not be sold as an offset more than once); and o avoidance of leakage (i.e., implementation of the carbon sequestration project will not result in higher GHG emissions outside that project's boundary); 		

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						<ul style="list-style-type: none"> • identify the costs of the required offsets for the entire life of the proposed long-range restoration project; and • demonstrate that the particular offset mechanism(s) to be relied upon will actually be available, sufficient, and effective throughout the life of the proposed long-range restoration project. <p>(c) Carbon Offsets Cannot be Used for GHG Emissions from Landscape Elements and Landscape-Altering Features of a Proposed Plan It would be misguided and unworkable for any type of carbon offset to be used as a way of attempting to counteract GHG emissions from landscape elements (e.g., areas of exposed lakebed and brine sinks) and landscape-altering features (e.g., canals, impoundments, and dust-control measures) of a proposed plan. As discussed above, such GHG emissions are unquantified and likely unquantifiable; they will be discharged by numerous, undetermined, and mutable biological and biogeochemical emission sources; and they will occur in different locations at varying rates across large-scale landscape areas for the entire life of the restoration project. It is simply impossible to genuinely offset such GHG emissions through the use of carbon offset mechanisms. Therefore, carbon offsets should not be allowed for GHG emissions from landscape elements and landscape-altering features of proposed long-range plans.</p> <p>(d) Carbon Offsets Based on Renewable Energy Projects Should Not Be Allowed The carbon offsets portion of the GHG criterion indicates that “carbon offsetting...through...renewable energies” would be permissible. This is misguided.</p> <p>For a new renewable energy project to be a valid carbon offset project, it must prove (in addition to satisfying other requirements) that there is “additionality” – i.e., that the renewable energy project providing the carbon offsets would not have been built if there were no need for the particular offsets it will be providing. This can rarely, if ever, be proven; and I suggest it cannot be legitimately proven in the Salton Trough where there is already widespread implementation of renewable energy projects based on market forces unrelated to carbon offsetting, and such implementation is expected to continue.</p>		

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						<p>In addition, Renewable Energy Credits are not offsets. For them to be translated into offsets it is necessary to prove that the clean energy at issue is actually displacing an equivalent amount of fossil fuel-produced electricity from the local grid. And even if that can be demonstrated, which is extraordinarily unlikely, the requirement of “additionality” for the offsetting renewable energy project must also be satisfied.</p> <p>Carbon offsetting that relies on renewable energy projects either on-site or offsite should not be allowed for proposed long-range restoration plans, and should be removed from the GHG criterion.</p> <p>(e) On-Site “Nature-Based Solutions” Should Not Be Allowed as Carbon Offsets The SSMP should not allow on-site “nature-based solutions” to be used as carbon offsets for purposes of reducing a proposed restoration plan’s GHG emissions.</p> <p>In general terms, a carbon offset is a purchased unit (typically one metric ton) of CO₂-e that is reduced or avoided, or removed from the atmosphere and sequestered, by a carbon offset mechanism or project in order to compensate for the same quantity of CO₂-equivalent GHG emissions occurring elsewhere. As discussed above, specific requirements must be met for a carbon offset mechanism or project to be considered valid and verified.</p> <p>On-site “nature-based solutions,” such as the planting of trees or other vegetation within the Salton Sea footprint, do not constitute “carbon offsets” unless they meet the definition of carbon offsets and satisfy the applicable stringent requirements. I suggest that onsite “nature-based solutions” will not be able to do so.</p> <p>It would, of course, be appropriate for a proposed restoration plan to utilize natural on- site biological and biogeochemical processes that are part of the proposed plan’s landscape elements and/or landscape-altering features to reduce a plan’s overall net GHG emissions. For example, an ocean water importation plan that refills the Salton Sea, restores its ecosystem, and naturally sequesters large quantities of carbon in the lakebed would have low (or negative) net GHG emissions as the result of natural biological and biogeochemical processes. But that is not “carbon offsetting.”</p>		

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423	7/27/2022	Jenny	Ross	Comment	Acceptability	<p>5. Methodology for Evaluating GHG Emissions Pursuant to the GHG Criterion</p> <p>The precise methodology for evaluating a proposed restoration plan's GHG emissions pursuant to the terms of the draft GHG criterion is unclear. The draft GHG criterion appears to indicate that the evaluation methodology to be used in applying the criterion to proposed long-range restoration plans is, at least in part, to compare each proposed plan's total GHG emissions over the entire life of the proposed restoration project with the total GHG emissions over that period that would be emitted under "baseline conditions." As explained above, this is an impossible comparison to make in any remotely defensible manner because it would involve layering multiple levels of unknowns on top of multiple levels of unknowns, and the result would be entirely speculative and potentially groundless. But the draft description of the GHG criterion also indicates that proposed restoration plans will receive "best," "medium," or "lowest" scores depending on what type of carbon offsets are used, and whether or not GHG emissions are so high as to render carbon offsetting infeasible. This methodology is too vague to be workable. In addition, what should matter the most when comparing proposed plans is the total quantity of net GHGs to be emitted by the features of each proposed plan; however, the draft description does not address that central issue.</p> <p>I suggest that the only reasonable approach is to estimate the total net GHG emissions from all elements of each proposed plan using a consistent methodology for all plans, and then compare the totals with one another in order to rank all proposed plans by their total net GHG emissions.</p> <p>Six months ago I recommended that the SSMP engage a panel of specialized experts to study actual net GHG emissions from landscape features at the Salton Sea in order to develop a basis for evaluating the net GHG emissions that will result from implementation of proposed long-range plans. Unfortunately it appears that recommendation was ignored. Now, the lack of even basic GHG emissions data specific to landscape features within the original footprint of the Salton Sea will complicate and make more uncertain any evaluation of the quantities of GHGs to be emitted from implementation of proposed long-range plans. Nonetheless, there are ways such an evaluation can be accomplished. However, a discussion of potential evaluation methodologies is beyond the scope of these comments.</p>	GHG emissions will be evaluated based on the level of detail we currently possess and the best available science. The methodology for GHG estimation will be described elsewhere in the document. The general comments are noted.	Committee written comments on Draft Criteria

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424	7/27/2022	Jenny	Ross	Comment	Effectiveness	<p>B. Revision of the Draft “Effectiveness” Category Description</p> <p>As described on page 2 of the Draft Criteria document, the “Effectiveness” category is intended to encompass criteria that measure the extent to which a proposed long-range restoration plan accomplishes an “objective from the core Salton Sea LRP objectives.” The “core Salton Sea LRP objectives” should mirror the actual legislative objectives set forth in the Salton Sea Restoration Act. Therefore, the description of the “Effectiveness” category should be revised to include the actual language of all the relevant legislative objectives contained in Sections 2931 and 2940 of the Salton Sea Restoration Act, rather than including only bullet items that rephrase and reinterpret a subset of the applicable statutory provisions.</p>	The Fish and Game Code requires Salton Sea restoration to be based on the preferred alternative, which must achieve the following three objectives: 1. Restoration of long-term stable aquatic and shoreline habitat for the historic levels and diversity of fish and wildlife that depend on the Salton Sea. 2. Elimination of air quality impacts from the restoration projects. 3. Protection of water quality. (FGC sec. 2391 and 2931.5). Section 2940 states what the Legislature hoped to achieve in settings these three objectives for Salton Sea restoration.	Committee written comments on Draft Criteria
425	7/27/2022	Jenny	Ross	Comment	Effectiveness	<p>C. Draft “Effectiveness” Criteria</p> <p>I offer the following comments concerning some of the specific Draft Criteria in the “Effectiveness” category that are presented in Table 1 on page 4 of the Draft Criteria document:</p> <p>1. Draft Criterion “Total Habitat Area”</p> <p>Draft Criterion Description: “Total area of habitat that will support bird populations at different depths and salinities. To support saltwater fish, salinities would ideally be near ocean salinities of 35 PPT, at least 20 PPT, and no more than about 60 PPT.”</p> <p>(a) It is unclear what features of proposed restoration plans would qualify as “habitat” for purposes of this criterion. “Habitat” must be defined; see the comments in section VI.B. above.</p> <p>(b) Unless the word “habitat” in this criterion is doing more work here than is apparent, the metric of “total habitat area” appears to be an overly simplistic proxy for effectiveness of project features in serving the aim of providing habitat that will restore “the historic levels and diversity of fish and wildlife that depend on the Salton Sea” as required by the Salton Sea Restoration Act. While more difficult to administer, a criterion that better evaluates the amount and types of high-quality habitat that are consistent with achieving the relevant statutory goals would be a preferable one. Alternatively, it is possible that the definition to be provided for the word “habitat” (see section VI.B. above) could be formulated in a manner to address this problem, so that the metric of “total habitat area” can be retained as the criterion.</p> <p>(c) The metric of total habitat area and the metric of salinity level are presented in a single criterion. Either the required salinity level (or range) should be a separate criterion, or it should be part of the definition of the term “habitat” that should be provided in a Definitions section at the beginning of the document setting forth the evaluation criteria.</p>	Habitat measures have been updated to reflect input from LRP Committee and the Salton Sea Science Committee.	Committee written comments on Draft Criteria

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						(d) The purpose of establishing a salinity level or range as a criterion is not limited to the need to support “saltwater fish” as the draft criterion states, or even to the need to support fish. Salinity is a crucial metric for ensuring the health and survival of all organisms in the Salton Sea ecosystem, including but not limited to fish, invertebrates such as the ones eaten by fish and non-piscivorous birds, and birds themselves. The salinity level or range used as a separate criterion or embedded in the definition of the term “habitat” should be the level or range that can ensure restoration of the abundance and diversity of organisms historically supported by the Salton Sea, as required by the Salton Sea Restoration Act. In addition, in setting the required salinity level or range, particular attention should be paid to the physiological needs of threatened and endangered species reliant on the Salton Sea ecosystem.		
426	7/27/2022	Jenny	Ross	Comment	Effectiveness	<p>2. Draft Criterion “Area of Shallow Habitat (0-1 foot)” Draft Criterion Description: “Total area of habitat that will support a fish population as a food source for wading birds, expected to be the area between the shoreline and the one-foot depth contour.”</p> <p>(a) It is unclear what project features would qualify as “habitat” for purposes of this criterion. “Habitat” must be defined; see the comments in section VI.B. above.</p> <p>(b) It is unclear why this criterion is limited to a depth of 1 foot. Larger wading birds may forage in somewhat deeper waters.</p> <p>(c) It is unclear why this criterion is limited to “habitat that will support a fish population as a food source for wading birds.” Numerous wading birds do not eat fish, and many wading birds that do eat fish also eat other organisms.</p> <p>(d) The phrase “expected to be” is ambiguous and inappropriate for use in a criterion.</p>	Habitat measures have been updated to reflect input from LRP Committee and the Salton Sea Science Committee.	Committee written comments on Draft Criteria
427	7/27/2022	Jenny	Ross	Comment	Effectiveness	<p>3. Draft Criterion “Length of Shoreline Habitat” Draft Criterion Description: “Total length of shoreline habitat that will support a fish population as a food source for wading birds.”</p> <p>(a) It is unclear what project features would qualify as “habitat” for purposes of this criterion. “Habitat” must be defined; see the comments section VI.B. above.</p> <p>(b) The aim of this criterion is unclear. As phrased, it appears to be redundant in relation to the criterion “Area of Shallow Habitat (0-1 foot)” which is also targeted at wading birds. Also, the metric of shallow habitat area (the previous criterion) is more appropriate for wading birds than the metric of shoreline length. If the target biota for this criterion are wading birds, then the previous criterion is more appropriate (but needs to be modified, as noted above), and this criterion should be eliminated.</p>	Habitat measures have been updated to reflect input from LRP Committee and the Salton Sea Science Committee.	Committee written comments on Draft Criteria

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						(c) On the other hand, if the goal of this criterion is to assess the amount of foraging habitat available for shorebirds that utilize the shallowest water and the edges of waterbodies where land and water meet, the criterion description is inappropriate and inadequate as phrased, and should be completely rewritten. First, the requirement that “shoreline habitat” must “support a fish population as a food source for wading birds” makes no sense if foraging habitat for shorebirds is the target of this criterion. Second, as currently worded the criterion could conceivably be interpreted to include the edges of all waterbodies impounded by berms and levees. But the manner in which impoundment berms and levees are ordinarily structured does not typically create habitat for shorebirds or suitable waterbody shorelines for shorebird foraging. Therefore a revised criterion targeted at foraging habitat for shorebirds should make clear that the edges of impoundment berms and levees do not constitute “shoreline habitat” unless they satisfy specified requirements.		
428	7/27/2022	Jenny	Ross	Comment	Effectiveness	<p>4. Draft Criterion “Long-Term Ability to Improve Water Quality” Draft Criterion Description: “The extent that a restoration concept improves water quality either in the inflowing waters or within the water bodies or habitat areas within the Salton Sea footprint.”</p> <p>(a) The concept of “improve” is unclear as used in this draft criterion and draft criterion description, because no baseline is specified. The relevant baseline must be defined. See the comments in section VI.A. above.</p> <p>(b) The draft criterion description should be rephrased to incorporate the crucial water- quality goals to: (1) serve specific beneficial uses; and (2) minimize potential harm to public health, wildlife, and the environment.</p>	We have updated this criterion to align with the Basin Plan. “Baseline” refers to a condition where the Salton Sea Phase 1 Plan has been implemented.	Committee written comments on Draft Criteria
429	7/27/2022	Jenny	Ross	Comment	Effectiveness	<p>5. Draft Criterion “Long-Term Ability to Reduce Dust Emissions from Exposed Lakebed and Protect and Improve Air Quality” Draft Criterion Description: “The ability to minimize dust emissions from exposed lakebed and thus protect and improve air quality compared to no action; actions and strategies that have the least total exposed emissive areas would score highest.”</p> <p>(a) The precise meaning of the “no action” baseline used here must be defined (see comments in section VI.A. above) if a baseline is to be used for this criterion. However, as discussed in item (c) below, I suggest that a baseline should not be used for this criterion.</p> <p>(b) The phrasing of this draft criterion implies that other air quality issues in addition to fugitive dust are encompassed by it, but the draft criterion description mentions no other air quality issues. There are in fact other air quality issues that should be included in this or another criterion, including potentially hazardous hydrogen sulfide emissions, and noxious odors such as those that may emanate from extremely hypersaline brine sinks.</p>	<p>“Baseline refers to a condition where the Salton Sea Phase 1 Plan has been implemented. We will not have a “no-action” concept for this evaluation; Language has been updated</p> <p>Criterion has been updated based on numerous comments. Emissions will now be evaluated through three fundamentally different approaches: 1) From simply quantifying exposed lakebed, 2) From modeling emissions coming from solely exposed lakebed, and 3) from modeling emissions from exposed lakebed and regional inputs.</p>	Committee written comments on Draft Criteria

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						<p>(c) In this draft criterion description and others, the word “emissions” should not be used without a modifier to make clear the type of emissions at issue. For example, the phrases “dust emissions,” “PM10 emissions,” “hydrogen sulfide emissions,” and “greenhouse gas (or GHG) emissions” should be used instead of the potentially ambiguous unmodified word “emissions.”</p> <p>(d) Based on the wording of the draft criterion description, the method for judging a proposed plan’s “ability to minimize dust emissions from exposed lakebed and thus protect and improve air quality compared to no action” is to “score highest” the proposed plans [13] that have the “least total exposed emissive areas.” This method would require quantifying the “total exposed emissive areas” as well as the “ability” to minimize dust emissions from them. There are fundamental problems with this approach, and therefore a different approach is required.</p> <p>(1) It is unclear why a comparison to no action is included in this criterion, since the method for judging a proposed plan using this criterion appears to involve a comparison with other proposed plans concerning the total amount of “exposed emissive areas,” not a comparison with a no-action baseline. Moreover, even assuming a comparison to a no-action baseline is the method intended to be used, such a comparison would be unworkable to execute. It is impossible to know what the dust emissions will be in a no-action scenario for the 75-year planning horizon without making many speculative assumptions that may be unwarranted. Therefore, the mention of a comparison to a no-action baseline should be eliminated.</p> <p>(2) It is not clear how the relevant “ability” can be determined and quantified. I suggest it cannot be, and that a proxy must be used to perform the evaluation required by this criterion. See item (4) below.</p>		

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						<p>(3) It is not actually possible to determine the total area of “exposed emissive areas” because many of the areas that may eventually be emissive are currently underwater and therefore cannot be physically characterized as emissive or not, and because a variety of factors that cannot be determined in advance may affect the locations and quantities of fugitive dust emissions across all exposed areas of the lakebed during the 75-year planning horizon.</p> <p>(4) In light of the above issues, a proxy must be used for the total area of “exposed emissive areas” and for a proposed restoration plan’s “ability to minimize dust emissions from exposed lakebed” in order to evaluate each proposed plan pursuant to this air quality criterion. The proxy to be used in this criterion and for comparing proposed plans with one another should be the total amount of lakebed that will be exposed pursuant to each proposed plan, based upon the assumption that each proposed restoration project will be constructed and operated as designed in the associated proposed plan, and will have the full inflows required by the plan’s design. Because it is impossible to apply this criterion to uncertain and mutable conditions, there should be no consideration of possible undetermined modifications of plan design that might be necessitated in the future because of reduced inflows. The question of whether or not the full inflows required in order to implement a proposed plan’s design will actually exist is a crucial issue, but one which is distinct and must be evaluated separately.</p> <p>(5) In addition, areas of exposed lakebed that have been labeled in some proposed restoration plans as being covered by “salt crust” should be counted as exposed lakebed for purposes of the calculation to be made pursuant to this criterion. In light of all the unknowns involved, it is speculative to suppose that particular areas will be covered by non-emissive salt crust under all potential circumstances during the next 75 years. [14]</p> <p>[13] The phrase “actions and strategies” is improperly used in the draft criterion description. The phrase “proposed plans” or the phrase “proposed restoration plans” should be used instead, as discussed in section VI.C. above.</p> <p>[14] Note that I am not referring here to the constructed evaporation ponds to produce salt that are in one of the proposed plans. Those evaporation ponds and the salt crust that may be formed in them are “landscape-altering features” of that plan (as defined in section VII.A.2(c)(2) above), not exposed lakebed.</p>		

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
430	7/27/2022	Jenny	Ross	Comment	Effectiveness	<p>6. Draft Criterion “Protect or Improve Air Quality (Public Health)” Draft Criterion Description: “The ability of a restoration concept to reduce the number of days where PM10 levels exceed safe standards in the region.” (a) A baseline is implicit in this criterion but is not defined. If a baseline is to be used for purposes of this criterion, it must be defined. See the comments in section VI.A. above. However, I suggest a baseline should not be used for this criterion. See the comments in section VII.C.5(d)(1) above.</p> <p>(b) It is not clear how the stated “ability” can be assessed and quantified either for each proposed plan or for baseline conditions. I do not think it can be. Therefore a quantifiable proxy for the stated “ability” is required.</p> <p>(c) To the extent that this criterion addresses particulate pollution, I suggest that this criterion should be combined with the previous criterion that is also related to particulates in order to create a single criterion focused on fugitive dust. I suggest that the total area of exposed lakebed (as described in sections VII.C.5(d)(4) and (5) above) should be used as the proxy for fugitive dust.</p> <p>(d) A criterion entitled “Protect or Improve Air Quality (Public Health)” could be retained to address the extent to which the design of each proposed plan minimizes or eliminates potential future hydrogen sulfide emissions and noxious odors.</p>	Criterion has been updated based on numerous comments. Emissions will now be evaluated through three fundamentally different approaches: 1) From simply quantifying exposed lakebed, 2) From modeling emissions coming from solely exposed lakebed, and 3) from modeling emissions from exposed lakebed and regional inputs.	Committee written comments on Draft Criteria
431	7/27/2022	Jenny	Ross	Comment	Effectiveness	<p>7. Draft Criterion “Pupfish Habitat and Connectivity” Draft Criterion Description: “Extent of pupfish connectivity between drains and inlets with water quality that can support pupfish; restoration concepts that maintain the highest amount of suitable connectivity would score highest.” (a) The draft criterion itself uses the term “pupfish habitat” but the draft description of the criterion does not address the issue of “pupfish habitat” and is instead limited to addressing the “extent of pupfish connectivity.” The draft criterion description should be revised so that, in addition to addressing the issue of “connectivity,” it also addresses the amount of “pupfish habitat” that will be provided by a proposed plan’s features.</p> <p>(b) It is unclear what project features would qualify as “habitat” for purposes of this criterion. “Habitat” must be defined; see the comments in section VI.B. above.</p>	Pupfish habitat will be better defined in the LRP document. The definition of the pupfish criteria will be updated considering these comments.	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
						<p>(c) The term “connectivity” must be defined in the description of this criterion. There is no need to use the phrase “suitable connectivity” if the term “connectivity” is appropriately defined. Also, the phrase “connectivity for pupfish” should be used instead of the phrase “pupfish connectivity.”</p> <p>(d) Based on the phrasing used in the draft criterion description, it is unclear whether the phrase “with water quality that can support pupfish” applies to “drains and inlets” or to “connectivity” corridors, or to both.</p> <p>(e) It is unclear what is meant by the word “inlets.” It appears that use of the word “inlets” is an error and that the word “tributaries” should be used instead.</p> <p>(f) Based on the phrasing used in the draft criterion description, it appears this criterion will not evaluate the amount of pupfish habitat to be supported by each proposed plan in waterbodies that are not “drains and inlets” or “connectivity” corridors. I suggest that it is important to include an evaluation of the amount of habitat for pupfish outside of drains, tributaries, and connectivity corridors. In light of the effects of climate change, as well as the significant decreases in wastewater flow into the central Salton Basin that will occur in the future because of Colorado River water scarcity, it is likely that available pupfish habitat in natural tributaries and drains will decrease in the future. Other pupfish habitat provided by proposed plans will be important for pupfish survival and should be evaluated pursuant to this criterion.</p>		
432	7/27/2022	Jenny	Ross	Comment	Efficiency	<p>D. Draft “Efficiency” Criteria</p> <p>I offer the following comments concerning some of the specific Draft Criteria in the “Efficiency” category that are presented in Table 4 on page 7 of the Draft Criteria document:</p> <p>1. Draft Criteria Related to Timing, Costs, and Incremental Benefits</p> <p>Draft Criteria: “Timeframe for Complete Solution,” “Capital Cost,” “Operation, Maintenance, Energy and Repair (OMER) Cost,” and “Provides Incremental Benefits with Incremental Funding”</p>	<p>Comment noted. These criteria are meant to identify potential tradeoffs that exist when compared to effectiveness, acceptability, and completeness.</p> <p>Agree that the cost of carbon offsets should be calculated to inform acceptability and efficiency.</p>	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
						<p>(a) High scores by a particular proposed plan on the above criteria related to timing, costs, and incremental benefits should not be allowed to counterbalance low scores on other types of criteria in this and other categories. If that were allowed, an otherwise inadequate plan that is inexpensive and quick to deploy could end up being highly ranked overall and potentially selected. Therefore, I suggest that the above criteria should not be applied to evaluate a proposed restoration plan unless and until that proposed plan has scored high enough on all other criteria, particularly those in the “effectiveness” category, to rank among the top few proposed plans.</p> <p>(b) The costs of any allowed carbon offsets necessary to counteract GHG emissions produced by essential construction, operation, and maintenance activities for a proposed plan (see the comments above in section VII.A.4(b), (c), (d), and (e) for the specific requirements related to use of carbon offsets) must be included when applying the “Capital Cost” and “Operation, Maintenance, Energy and Repair (OMER) Cost” criteria. The total costs for all necessary carbon offsets for the entire life of the proposed restoration project must be included in the relevant cost calculations.</p>		
433	7/27/2022	Jenny	Ross	Comment	Efficiency	<p>2. Draft Criterion “Earthquake Risk” Draft Criterion Description: “The potential seismic exposure of elements of a restoration concept, such as earthworks and other engineered elements. Also, consideration of induced seismicity due to expansion of geothermal development in the southern part of the Salton Sea. Time and cost to restore functionality will be considered for this criterion.”</p> <p>(a) The first two sentences of this criterion’s draft description are not phrased as actual sentences, and are unclear and ambiguous. They should be rewritten to express exactly what is being evaluated by this criterion and in what manner. The meaning of the terms used should be explicitly and clearly defined if it is not self-explanatory (i.e., if the meaning is not the normal, everyday English meaning of a commonly used word or phrase).</p> <p>(b) Many key features of proposed in-basin long-range plans to be constructed on the Salton Sea lakebed would be built directly on top of the Brawley Seismic Zone, and/or the eastern Elmore Ranch Fault, and/or the Extra Fault Zone, and/or the Salton Trough Fault, and/or other unnamed but identified faults. In addition, other major faults, including but not limited to the southern San Andreas Fault and the Imperial Fault, are nearby. Shaking in the event of an earthquake is not the only seismically related or fault-related mechanism that may cause damage to such proposed in-based features on the lakebed. The following processes and the associated damage they may cause must also be considered by the SSMP: liquefaction, co-seismic slip, and aseismic creep.</p>	This criterion has been updated to incorporate multiple comments. Additionally, language has been revised for clarity.	Committee written comments on Draft Criteria

No.	Comment Date	First Name	Last Name	Type	Topic	Synopsis	Response	Comment Source
						<p>(c) The SSMP should anticipate the possibility that damage from shaking, co-seismic slip, and liquefaction could be so severe as to incapacitate or destroy large portions – or even the entirety – of a proposed in-basin restoration project constructed on the lakebed. For example, a recent modeling study found that co-seismic slip in the event of a major earthquake could be as large as 6 meters in regions of the Salton Sea footprint where proposed in-basin plans would build key infrastructure. [15] That amount of co-seismic slip and the associated shaking would cause widespread liquefaction and would likely result in shearing and/or collapse of berms, major dikes and barriers, and potentially the causeway that would cross the entire central Salton Basin from southwest to northeast pursuant to one proposed plan. Complete loss of impounded fresh and low-salinity water from containment structures, and blending of that previously impounded water with extremely hypersaline water in a central brine sink should be considered a realistic possibility. In such circumstances, rebuilding of the entire restoration project could be necessary. Potentially, such rebuilding might not be feasible.</p> <p>(d) In addition to induced seismicity because of expanding geothermal development and the anticipated initiation of commercial-scale lithium extraction, the SSMP should also consider the possibility of induced seismicity from hydrologic unloading of faults, as well as from large-scale sediment compaction beneath the lakebed. Such processes could occur because large areas of lakebed will become desiccated pursuant to in-basin plans, and because the quantities of reinjected geothermal brine could be significantly less than the quantities extracted.</p> <p>[15] Kyriakopoulos, C., Oglesby, D. D., Rockwell, T. K., Meltzner, A. J., Barall, M., Fletcher, J. M., & Tulanowski, D. (2019). Dynamic rupture scenarios in the Brawley Seismic Zone, Salton Trough, southern California. <i>Journal of Geophysical Research: Solid Earth</i>, 124, 3680–3707. https://doi.org/10.1029/2018JB016795.</p>		